# **STURDY INDUSTRIES LIMITED**

CIN: L25209HP1989PLC009557; Email Id: legalsturdy@gmail.com Registered Office: Plot Number 57, First Floor, Sector-1, Parwanoo, Solan Himachal Pradesh- 173220

Date: 30.05.2024

То

The Manager Department of Corporate Services Bombay Stock Exchange Limited PJ Tower, Dalal Street, Mumbai, Maharashtra-400001.

#### COMPANY CODE: 530611.

<u>Subject:</u> Submission of Secretarial Audit Compliance Report for the financial year ended 31<sup>st</sup> March, 2023 pursuant to Regulation 24(A) of Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Dear Sir/Madam,

Pursuant to Regulation 24(A) of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed herewith the Secretarial Audit Compliance Report for the financial year ended 31<sup>st</sup> March, 2024 issued by the Practicing Company Secretary.

Kindly take on record the same and oblige.

Thanking You.

Yours Faithfully, FOR STURDY INDUSTRIES LIMITED RAMESH KUMAR GUPTA

RAMESH GUPTA WHOLE TIME DIRECTOR (DIN: 00161363).

Mfrs. of: Aluminium Conductors, Storewel Water Storage Tanks, Swati HDPE Pipes, Sprinkler & Drip Irrigation Systems



(A Peer Reviewed Firm)

Registered office: 45/2, Near Anardana Chowk, Patiala Punjab 147001 Mobile Number: +91 90411-96150; Email Id: riyagarg1511@gmail.com

#### SECRETARIAL COMPLIANCE REPORT OF M/S. STURDY INDUSTRIES LIMITED FOR THE FINANCIAL YEAR ENDED 31<sup>ST</sup> MARCH, 2024

We have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by M/s. **Sturdy Industries Limited** (CIN: L25209HP1989PLC009557) (hereinafter referred as 'the listed entity'), having its registered office at Plot Number 57, First Floor, Sector-1, Parwanoo, Solan Himachal Pradesh- 173220 and Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and to provide our observations thereon.

Based on our verification of the listed entity's books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Review, we hereby report that the listed entity has, during the review period covering the financial year ended on 31<sup>st</sup> March, 2024 complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter :

I, Riya Garg, Practicing Company Secretary have examined:

- (a) all the documents and records made available to us and explanation provided by M/s. Sturdy 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 31<sup>st</sup> 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

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(A Peer Reviewed Firm) Registered office: 45/2, Near Anardana Chowk, Patiala Punjab 147001 Mobile Number: +91 90411-96150; Email Id: riyagarg1511@gmail.com

 (b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India ("SEBI");

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

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

Based on the above examination, I/We hereby report that, during the Review Period:

- I. (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:
   Details are enclosed as Annexure- 1
  - (b) The listed entity has taken the following actions to comply with the observations made in previous reports:
    Details are englanded as Amountain 2

Details are enclosed as Annexure- 2.



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# II. Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries asper SEBI Circular CIR/CFD/CMD1/114/2019 dated 18<sup>th</sup> October, 2019:

S. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations/ Remarks by PCS*
1.	Compliances with the following conditions while a	ppointing/reappo	inting an auditor:
	<ul> <li>i. If the auditor has resigned within 45 days from the end of a quarter of a financial year, the auditorbefore such resignation, has issued the limited review/ audit report for such quarter; or</li> <li>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</li> <li>iii. If the auditor has signed the limited review/ audit report for such quarter as well as the next quarter; or</li> <li>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 first three quarters of a financial year as well as 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.</li> </ul>	Not Applicable.	The statutory auditors has not resigned during the financial year.
2.	Other conditions relating to resignation of statutor	y auditor	
	<ul> <li>Reporting of concerns by Auditor with respect to the listed entity/its material subsidiary to the AuditCommittee:</li> </ul>	Not Applicable.	The statutory auditors has not resigned during the financial year.



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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 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.
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
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	accordance with the Standards of Auditing as specified by ICAI / NFRA, in case where the listed entity/ its material subsidiary has not provided information asrequired by the auditor.		
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.	Not Applicable.	The statutory auditors has not resigned during the financial year.

\*Observations/Remarks by PCS are mandatory if the Compliance status is provided as 'No' or 'NA'

III. I/we hereby report that, during the review period the compliance status of the listed entity is appended asbelow :

S. 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 of India (ICSI), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.	No	The company is not complying with some of the secretaria standards as there is no Company Secretary in the company since 28 <sup>th</sup> May, 2022.
2.	<ul> <li>Adoption and timely updation of the Policies:</li> <li>All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities.</li> <li>All the policies are in conformity with SEBI Regulations and have been reviewed &amp; updated on time, as per the regulations/circulars/guidelines issued by SEBI.</li> </ul>	No	The company has adopted the requisite policies. However, the same have not been updated from time to time.
	Page <b>5</b> of <b>10</b>		CA No. 22677



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3.	Maintenance and disclosures on Website:	No	The company is
	• The Listed entity is maintaining a functional		maintaining a website,
	website.		However, the same
	• Timely dissemination of the documents/		have not been
	information under a separate section on the		adequately updated.
	website.		
	<ul> <li>Web-links provided in annual corporate</li> </ul>		
	governance reports under Regulation 27(2) are		
	accurate and specific which re- directs to the		
	relevant document(s)/section of the website.		
4.	Disqualification of Director:	Yes	-
	None of the Director(s) of the Company is/are		
	disqualified under Section 164 of Companies Act,		
	2013 as confirmed by the listed entity.		
5.	Details related to Subsidiaries of listed entities	Not Applicable	The company has no
	havebeen examined w.r.t.:		material subsidiary.
	(a) Identification of material subsidiary		
	companies.		
	(b) Disclosure requirement of material as well		
	as other subsidiaries.		
6.	Preservation of Documents:	Yes	As per the
	The listed entity is preserving and maintaining		representation letter
	records as prescribed under SEBI Regulations and		received from the
	disposal of records as per Policy of Preservation of		management is
	disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under		management is complying with the
	Documents and Archival policy prescribed under		complying with the
	Documents and Archival policy prescribed under		complying with the regulations of





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7.	Performance Evaluation:	Yes	-
	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.		
8.	Related Party Transactions:	Yes	-
	(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.		
9.	Disclosure of events or information:	No	The management has
	The listed entity has provided all the required		not made all the
	disclosure(s) under Regulation 30 along with		requisite disclosures
	Schedule III of SEBI LODR Regulations, 2015 within		under Schedule III,
	the time limits prescribed thereunder.		within the prescribed
			time limits.
10.	Prohibition of Insider Trading:	No	The management
	The listed entity is in compliance with Regulation 3(5)		could not produce
	& 3(6)SEBI (Prohibition of Insider Trading) Regulations,		the requisite record
	2015.		required to be
			maintained in
			Structural Digital
			Database.





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11.	Actions taken by SEBI or Stock Exchange(s), if any:	Yes	The actions taken by
	No action(s) has been taken against the listed		SEBI or Stock
	entity/ its promoters/ directors/ subsidiaries		Exchange(s) against
	either by SEBI or by Stock Exchanges (including		the company are
	under the Standard Operating Procedures issued		provided in separate
	by SEBI through various circulars) under SEBI		paragraph 1(a) of this
	Regulations and circulars/ guidelines issued		report as annexed to
	thereunder except as provided under separate		this report.
	paragraph herein (**).		
12.	Additional Non-compliances, if any:	No	i. The company has
	No additional non-compliance observed for any		not placed in a
	SEBI regulation/circular/guidance note etc.		meeting of Board of
			Directors:
	<u>^</u>		
			1. The non-
			compliances
			identified by the SEBI
			or Stock Exchange(s);
			2. Subsequent action
			taken by the SEBI or
			Stock Exchange(s) in
			this regards.
			Hence, no
			comments/ action
			taken by the Board
			on the non-
			compliances were
			informed to the
			Stock Exchange for
			dissemination.
			ii. The company has
			not paid Annual
		the second s	Custodian fees to
	Page <b>8</b> of <b>10</b>	·RIVAG	NNC. 19980 GP No. 22577



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	Mobile Number: +91 90411	-96150; Email Id: r	iyagarg1511@gmail.com
			NSDL resulting the
			listing into -
			a) Suspended from
			trading on BSE
			Limited.
			b) Non Receipt of
			BENPOS for year
			ending 31 <sup>st</sup> March,
			2024 and hence not
			able to file the
			following:-
			1. Reconciliation of
			Share Capital Audit
			Report pursuant to
			Regulation 76 of SEBI
			(Depositories and
			Participants)
			Regulations, 1996;
			2. Certificate from
			Practicing Company
			Secretary for
			issuance of share
			certificates pursuant
			to Regulation 40(9)
			of the SEBI (LODR)
			Regulations, 2015;
			3. Shareholding
			pattern pursuant to
			Regulation 31 of the
			SEBI (LODR)
			Regulations, 2015;
		CRASE	
L		GARG & ASSOC	iii. The company has
	Page <b>9</b> of <b>10</b>	M No. 5990 H CP No. 2297 6 CP No. 2297 6 CAMPANY Sector	
			/



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not completed ERP
process and update
the KYC of their
clients as prescribed
under Rule 9(1a) of
PML Rule
(Maintenance of
Records), 2005.

#### Assumptions and 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 Accounts of the listed entity.
- 4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) 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.



PR No.: 3666/2023 Place: Chandigarh Date: 30/05/2024 UDIN: A059980F000500970

**RIYA GARG & ASSOCIATES** COMPANY SECRETARIES COMPANY SECRETARY IN PRAC M. NO.: 59980; C.P. NO.: 22677

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

	R (100 59980 ) 77									
	Regulation 23 (9 20 (SEBI		December 14, 2023the management.							
	as speaified, under	Rs. 1,88,800/- ondisclosure was not made by as 👔 🔅	Rs. 1,88,800/- on				2023.			
	said opinion that the disclosure	However,	September, 2023-results.				September,			
	of financialthe management was of	publication of financial	below:	September, 2023.		30th	ended			
	September, 2023, therefore,	30th as fine as mentioned required to be on the date of September, 2023, therefore,	has fine as mentioned	ended 30t		year	the half			
	wasthe half year ended 30 <sup>th</sup>	2023	for the half year entity and imposed September,	for the half yea		for	transactions for		tions.	transactions
	30 <sup>th</sup> with the related party during	ended	transactionsletter to the listinghalf year	party transaction		party	related p	party Regulations, 2015.		related
	compliance party transactions for the entered into any transaction	party transactions for the		details of related non-		of Exchange.	(LODR) of details	of(SEBI (LODR		disclosures
Nil.	of relatedSince the company had notNil.	disclosure	of The BSE has served The	Non-submission c	Fine	ion Stock	23(9) of Non-submission Stock	ofRegulation 23(9) c		2. Submission
							financial year.			
		the financial year.				the	closure of			
		Secretary till the closure of		the financial year.		the	Secretary till the			
		not appointed Company		till the closure of Q3: 1,08,560/-			Company			
		However, the company has		Company Secretary Q2: 1,08,560/-		nted	not appointed			
	resignation. of appointment.	date of resignation.		has not appointed Q1: 1,07,380/-		has	the company has			
	candidate accepts the offer	within six months from the candidate accepts the offer		and the companyfollows:		and	May, 2022 and			
	aswas required to be filled is in losses, no suitable	was required to be filled		from 28 <sup>th</sup> May, 2022 mentioned		28 <sup>th</sup>	effect from 28 <sup>th</sup>			Officer.
	quarters 2022 and the said vacancy However, since the company	2022 and the said vacancy		resigned with effect3		with	resigned		Ince	Compliance
	Company Secretary.	hadthe listing entity forwith effect from 28 <sup>th</sup> May,Company	dthe listing entity for	company ha		had	company	and Regulations, 2015.		Secretary
	appoint a Wholetime	to the company had resigned appoint	the imposed a fine to	Secretary of th		theExchange	(LODR)Secretary of the Exchange	(SEBI (LODR	γı	Company
Nil.	Efforts are being made to Nil.	has The Company Secretary of Efforts are	BSE	The CompanyThe	Fine	CompanyStock	of The Comp	ofRegulation 6(1) o		Appointment
										clause)
									ng specific	including
									les	guidelines
									/s/	circulars/
		Secretary					~		tions/	(Regulations/
		the Practicing Company			Action	Taken by		Number		No. Requirement
Remarks	of Management Response	Observations/Remarks of	Fine Amount	<b>Detailsof Violation</b>	Type of	Action	Deviations	Regulation/Circular Deviations		S. Compliance

	m 28665 built a								
<u>ה ה כ ה</u>	with respect to encumbrance requisite compliance can be of shares, directly ormade and filed the same on indirectly, other than those11.05.2023 during the already disclosed during thefinancial year under review. financial year as specified under Regulation 31(4) of (SEBI (SAST) Regulations, 2011.		Ê			encumbrance of shares.	lations, 2	shares.	
n Nil.	The promoters have notThe management has takenNil.	Nil	Non-submission of declaration of	Not Applicable	N	.(4) of Non-submission (SAST) of declaration of	ofRegulation 31(4) of Non-submission (SEBI (SAST) of declaration of	Disclosure encumbered	•
ts ie Nil.	The company has notThe management is in theNil. disseminated adequate process of updating the information specified in requisite information on its Regulation 46 and 62 of (SEBI website. (LODR) Regulations, 2015 on its website.	Z.	Non-dissemination of requisite information on the website of the company.	Not Applicable.	Z	Non- Idissemination of requisite information on the website of the company.	ofRegulation 46 and Non- 62 of (SEBI (LODR)dissemination of Regulations, 2015. requisite information on the website of the company.	Maintenance functional website.	[ * ]
יח Nil. ספ	Delay in Closure of TradingThe management has takenNil. Window for the Q 3 and 4. note of the same so that the requisite compliance can be made.	<u>.</u>	Delay in Closure of Trading Window during the financial year under review.	Not Applicable.	Z	ofDelay in Closure adof Trading 9Window. on 18)	Trading Clause 4(2) of Delay in Schedule B read of with Regulation 9 Window. of SEBI (Prohibition of Insider Trading) Regulations, 2015.	Closure of Tradi Window	7
15 De	- (LODR) Regulations, 2015 was not required to be submitted.	and Rs. 2,95,000/- on January, 01, 2024.							

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

100% shareholding promoters is held itained in demat fo ever, the sharehold ome members of noters group is not f emat form since th active, hence munication can be m them. The manager taken note of the sa that the requ pliance can be made. management has ta of the same so that isite compliance car e.	RI CP NOL 22877							
ofdegulation 31(2) of/The         100%         NII         Med         The         100%         NII         The 100%         Shareholding of the promoters is held promoters is held promoters and the promoters group in not held in dematerialized form and the same is not maintained or a same is not maintained on a continuous basis.         Ime 100%         Shareholding of the promoters and the same is not maintained or same is not members of a continuous basis.         Ime 100%         Shareholding of the same is not maintained or same is not active, hence continuous basis.           Regulation 57         of Non-submission of the SEBU (LODR) or certificate         NII         Not         Not         Nor submission of a the certificate with respect to payment of a the certificates note of the same is not matter and the certificates note of the same so that with respect to payment of a the certificates or that with respect to payment of a convertible securities as particulate compliance can be made.           ble         principal         principal         convertible securities as particulate or or stell in terest/ indicend principal made.         <	WA & ASS				securities.			
offegulation 31(2) offine         100%         Nil         The         100%         Nil         The 100% shareholding offine	Regulations, 2015.				non-convertible			
offegulation         31(2)         offne         100%         Nil         The         100%         Nil         The 100%         Shareholding, off         Mapplicable         Shareholding         offne         100%         Shareholding, offne         100%         Shareholding         offne         100%         Shareholding         offne         the promoters         and promoters         and promoters         and promoters         group in         not         hed         in         dematerialized         form         and promoters         group in not         hed         promoters         group in         not         hed         promoters         group in         not         hed         promoters         group is not in           dematerialized         not         held         in         dematerialized form         not maintained on a         not maintained in demat form         not members are in         not members are in         not members         not members         not members         not members         are in         not members         not members         not members         are in         not members         not members	of SEBI		securities.				securities.	
offegulation         31(2)         offne         100%         Nil         Met         The 100%         Shareholding offne         100%         Shareholding of the promoters and the promoters and the promoters and the promoters and the promoters group in not held maintained in dematerialized form and the same is not form and the same is not maintained on a continuous basis.         In dematerialized form and the continuous basis.         promoters are the same is not maintained on a continuous basis.         promoters are the same is not maintained on a continuous basis.         promoters are the same is not maintained on a continuous basis.         promoters are the same is not subscript and the same is not continuous basis.         Nil         Not         Not         Not         Not         Not subscript and the same is not subscript and promoters group is not subscript and promoters group is not subscript and promoters group is not satis.         promoters group is not subscript and promoters are the same is not continuous basis.         promoters group is not subscript and promoters are the subscript and promoters are pr	specified under Regulation		convertible		principal		non-convertible	
of Regulation         31(2)         of The         100%         Nil         The         100%         Shareholding         of The         100%         Shareholding         of The         100%         Shareholding         of The         100%         Shareholding         of The         100%         Nil         The         100%         Shareholding         of The         100%         Shareholding         Interastion of The         100%         Shareholding         Inte<	securities		obligations for non-		dividend/			
offRegulation         31(2)         ofThe         100%         Nil         The         100%         Stareholding         of the         Promoters         and the         promoters         and promoters         in dematerialized         form and the         promoters         group in not         held         in dematerialized         form and the         promoters         group is not         form and the         promoters group is not	for		dividend/ principal		interest/		principal	
of Regulation 31(2) of The100%NilThe100%NilThe 100% shareholding of Theand (SEB)(LODR) shareholding ofApplicableshareholding of thethepromoters and the promoters and the promoters and the promoters and the promoters group in not heldin dematerialized form and theandpromotersin otin thein the annet is not held in and the same is not maintained on a continuous basis.in dematerialized form and the same is not maintained on a continuous basis.promoters group is not in demat form since the same is not maintained on a continuous basis.basis.basis.in dematerializedin dematerialized form and the same is not in demat form since the nembers of in demat form since the same is not active, hence communication can be made.kegulation 57of Non-submissionNilNilNilThe company has delayed in the management has ta saten note of the same so that the required in the same so that submitting the certificates note of the same so that submittin	interest/ dividend/ principalmade.						interest/ dividend/	
of Regulation 31(2) of The100%NiThe100%NiiThe100%Shareholdingof The100%Shareholdingof The100%ShareholdingIn100%ShareholdingIn100%ShareholdingIn100%ShareholdingIn100%ShareholdingIn100%ShareholdingIn100%ShareholdingIn100%ShareholdingIn100%ShareholdingInIn100%ShareholdingIn100%ShareholdingIn <td>with respect to payment offrequisite compliance can be</td> <td></td> <td>respect to payment</td> <td></td> <td>with respect to</td> <td></td> <td></td> <td></td>	with respect to payment offrequisite compliance can be		respect to payment		with respect to			
ofRegulation         31(2)         ofThe         100%         Nil         Not         The         100%         Nil         The         100%         Shareholding         ofThe         promoters         and the         promoters         and promoters         and promoters         and promoters         and promoters         and         promoters         group in         not         held         in         form         and         the same is not         form same is not         form same is not         form since the same is not         form since the same is not         form since the same is not         form same form since the same is not         form same form since the same since the same since the same since the same since         form same form same form same form same promoters group is not the same since         form same form same form since the same since the same since the same since         <	submitting the certificates note of the same so that the		certificate	Applicable				
ofRegulation 31(2) of The         100%         Nil         The         100%         Nil         The         100%         Nil         The         100%         Shareholding         of The         100%         Shareholding	The company has delayed in The management has taken Nil.	Nil			Non-submission	57	Certificate	- 1
ofRegulation         31(2)         ofThe         100%         Nil         The         100%         Shareholding         ofThe         100%         Shareholding	compliance can be made.							
ofRegulation 31(2) ofThe100%NilIne100%NilThe100%NilThe100%ShareholdingofThe100%Shareholdingand (SEB)(LODR)shareholdingofhepromotersandpromotersandthepromoterspromotersandthepromoterspromoterspromoterspromoterspromoterspromoterspromoterspromoterspromoters<	that the							
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ofRegulation 31(2) ofThe100%NilIne100%NilThe100%Niland(SEBI(LODR) shareholding ofApplicableshareholding of thethepromotersandthepromotersandthepromotersandthepromotersandpromoterspromotersandpromotersandpromotersandpromotersandpromoterspromotersandpromoters	with them. The management				basis.			
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ofRegulation 31(2) ofThe100%NilNilThe100%NilThe100% shareholding ofand(SEBI(LODR) shareholding ofhepromotersandpromotersandpromotersandpromotersandpromotersandpromotersandpromotersandpromotersandpromotersandpromotersandpromotersandpromotersandpromotersandpromoterspromotersgroup innotheldinindematerialized formin dematerialized formthe same is notin demat form since thin demater since since thin demater since	subscribers and presently are		continuous basis.		S.			
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ofRegulation 31(2) ofThe100%NilNilThe100%ShareholdingofThe100%shareholdingand(SEBI(LODR)shareholding ofApplicableshareholding of thethepromotersand the promotersand the promotersand the promotersand the promotersandup inRegulations, 2015.thepromotersandpromotersgroup inand promoterspromotersgroup inand promoterspromotersgroup inand promotersgroup inininindematerialized form andHowever, the shareholdandgroup in notnotheldinthe same is not maintained of some members of			dematerialized form		held in			
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ofRegulation 31(2) ofThe 100% Nil Not The 100% Nil The 100% shareholding ofThe 100% shareholding and(SEBI (LODR)shareholding of Applicable shareholding of the the promoters and the promoters is held oup inRegulations, 2015. the promoters description of the promoters and promoters group in not held maintained in demat for	in dematerialized form and However, the shareholding		promoters group in				dematerialized	
ofRegulation 31(2) ofThe 100% Nil Not The 100% Nil The 100% shareholding ofThe 100% shareholding and(SEBI (LODR)shareholding of Applicable shareholding of the the promoters and the promoters is held	promoters group in not heldmaintained in demat form.						promoter group in	
ofRegulation 31(2) ofThe 100% Nil Not The 100% Nil The 100% shareholding ofThe 100% shareholding	promoters			Applicable	shareholding of			
		Nil			100%	Regulation 31(2) of		

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

·~	Advertisement i	inRegulation 47 of	of The financial	Nil	Not	The financial results	Nil	The financial results. asT	asThe management has takenNi
	Newspapers.		lts		Applicable	of the company		cified in Regulation	in Regulation 33, note of the same so that the
		Regulations, 2015.	company (both			(both quarterly and		alongwith the modified r	modified requisite compliance can be
			quarterly and			annual) were		or resei	nade.
			annual) were			published in one		if any, were required to be	
			published in one			English language		published in atleast one	
			English language			local daily		English language national	
			local daily			newspaper		and one daily newspaper	
			newspaper			circulating in the		circulating in the whole or	
			circulating in the			region where the		substantially the whole of	
			region where			registered office of		India. Whereas, the same	
			the registered			the listed entity is		has not been published in	
			office of the			situated.		last two quarters of the	
			listed entity is					financial statement.	
			situated.						
	Minimum Promoter	SEBI (ICDR) Non Regulations, 2018. mair	Non maintenance of	Nil	Not Applicable	Non-maintenance of minimum promoter	Nii	The minimum promoter The management has taken shareholding of the company note of the same so that the	promoter The management has taken Nil
	Shareholding.		minimum			shareholding in the		had fallen below the limit requisite compliance can be	equisite compliance can be
			promoter shareholding in			company.		prescribed under SEBI (ICDR)made. Regulations. 2018.	nade.
			the company.						
.o	SDD Nor	Non-Regulation 3(5) &	& The company	Nil	Not	The company has	Nii	The company has been T	been The management will take Nil
	Compliant	SE	has been		Applicable	been declared as		declared as SDD non	nonecessary actions so that the
	Company	(Prohibition of	ofdeclared as SDD			SDD non-compliant		compliant company on the requisite compliance can be	equisite compliance can be
		Insider Trading)	Trading)non-compliant			on the BSE Stock		website of the Bombay Stockmade	nade & Asc
		Regulations, 2015.	on the BSE Stock			exchange.		Exchange.	Carlo Contra Con
I			exchange.				A .		MNO. 59980
						0	hart		a constant of
							3		Sand Societar

matters specified below:

(a) The listed entity has complied with the provisions of the above Regulations and circulars/guidelines issued thereunder, except in respect of

"Bany Sector					
application was not			exchange.		
			the stock		
from the date of approval by with Bombay	the stock exchange.		shareholders with		
	shareholders with		Public category		
closure of imposed	Public category		shareholders as		
(D	shareholders as		Promoter Group	shareholders.	S
category shareholders wassaid application is pendingto non-payment	Promoter Group		Promoter/	Public category	P
shareholders as Public not be paid. Hence, the application due	Promoter/		reclassification of	shareholders as 2015.	S
Groupthe stock exchange could closed	reclassification of		application for	Promoter Group Regulations,	P
reclassification of Promoter/funds, the fine imposed by Exchange has	of application for	ange.	submission of Exchange.	Promoter/ of (SEBI (LODR)submission	P
An application for Due to non-availability of The St	Delay in submissionRs. 6,43,100	k Fine.	31(a)Delay inStock	Reclassification of Regulation 31(a)	2. R
			financial year.		
the financial year.			closure of the		
Secretary till the closure of	the financial year.		Secretary till the		
not appointed Company	till the closure of		Company		
However, the company has	Company Secretary		appointed		
date of resignation.appointment.	has not appointed		company has not		
within six months from the accepts the offer of	and the company		May, 2022 and the		
was required to be filled no suitable candidate	from 28 <sup>th</sup> May, 2022		effect from 28 <sup>th</sup>		0
2022 and the said vacancythe company is in losses, Secretary.	resigned with effect		resigned with	Compliance 2015.	C
with effect from 28" May,Secretary. However, sinceCompany	company had		company had	Secretary and Regulations,	Se
the company had resigned appoint a Company Wholetime	Secretary of the	ange	Secretary of the Exchange	Company of (SEBI (LODR)Secretary	C
The Company Secretary of Efforts are being	The CompanyRs. 1,06,200	Fine	The CompanyStock	Appointment of Regulation 6(1) The	1. Ap
				clause)	cla
				including specific	Ŀ.
				guidelines	gu
				circulars/	ci
Secretary				(Regulations/	(R
the Practicing Company		n by Action	Taken by	Requirement lar Number	No. Re
Fine Amount Observations/Remarks of Management Response Remarks	Detailsof Violation Fine Amo	in Type of	Deviations Action	Compliance Regulation/CircuDeviations	S. Co

ANNEXURE-2

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fee for maintaining the website.	(בסטה) הפטומנוטחז, 2013 טח its website.	company.						
e information on its	Information specified infrequisite Regulation 46 and 62 of (SEBI/website	information on theimposed. website of the rompany		information on the website of the company.		(LODR) Regulations, 2015.	website.	
notThe management is in theDue to financial theprocess of updating thecrunches the		Non-dissemination No fine of requisite been	Not Applicable.	46 Non-dissemination Nil EBI of requisite	IS)	of	Maintenance functional	4.
related Since the company had not The company or the entered into any has filed the 30 <sup>th</sup> transaction with the requisite was related party during the disclosure with within half year ended 30 <sup>th</sup> the stock late of September, 2022, exchange. inancial therefore, the said management was of on 16 <sup>th</sup> opinion that the disclosure receipt as specified under stock Regulation 23 of (SEBI (LODR) Regulations, 2015 was not required to be submitted. However, on advice of professionals the said disclosure was submitted by the company with the stock exchange.	The disclosure of party transactions f half year ended September, 2022 required to be made 15 days from the c publication of fi results. However, disclosure was made January, 2023 after of notice from the exchange.	Non-submission ofRs. 6,51,360 details of related party transactions for the half year ended 30 <sup>th</sup> September, 2022. September, 2022.	Fine.	ofRegulation 23 ofNon-submission ofStock of(SEBI (LODR)details of relatedExchange. tyRegulations, party transactions 2015. for the half year ended 30 <sup>th</sup> September, 2022.	23 ofNon-submission LODR)details of relat s, party transactio ended 3 September, 2022.	ofRegulatio of(SEBI 2015.	Submission disclosures related transactions.	ω
	submitted by the company with the stock exchange within the requisite period.							

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RIVERNIO. 22677 65 Originality Sector					_		
submitted the certificates note of the same so that management submitted the certificates note of the same so that management with respect to payment of the requisite compliance has taken due interest/ dividend/ principal can be made & ASSOC with the said obligations for non-	as	Non-submission ofNo fine h certificate withbeen respect to payment imposed. of interest/ dividend/ principal	Applicable	Regulation 57 ofNon-submission ofNil (SEBI (LODR)certificate with Regulations, respect to 2015. payment of interest/dividend/	Certificate Regulation 57 of confirming the(SEBI (LODR) payment ofRegulations, interest/ dividend/2015.		7.
The 100% shareholding of The 100% shareholding of The promoters and the promoters is held and management is promoters group in not held maintained in demat form. still under the promoters group in not held maintained of some members of the the shareholding process to get promoters group is not promoter group is not promoter held in demat form since dematerialize. These members are lnitial subscribers and presently are not active, hence no communication can be made with them. The management has taken note of the same so that the requisite compliance can be made.	ine has sed.	The 100% No f shareholding of thebeen promoters and impo promoters group in dematerialized form and the same is not maintained on a continuous basis.	Notice.	The 100%Stock shareholding of Exchange. the promoters and promoters group in not held in dematerialized form and the same is not maintained on a continuous basis. basis.	ofRegulation 31(2) and of (SEBI (LODR)s p inRegulations, t 2015.	Shareholding promoter(s) dematerialized form.	ف
The promoters have not The promoters have not The management has taken The yearly declaration note of the same so that management equisite compliance has filed the same on of shares, directly or can be made.Same n n 11.05.2023 with 11.05.2023 with stock exchange.indirectly, other than those already disclosed during the financial year as specified under Regulation 31(4) of (SEBI (SAST) Regulations, 2011.Stock exchange.	fine has sed.	Non-submission of No declaration of been encumbrance of impo shares.	Applicable d	Non-submission ofNil declaration of encumbrance of shares.	ofRegulation 31(4)Non-submission ofNil of (SEBI (SAST)declaration of Regulations, encumbrance of 2011. shares.	Disclosure encumbered shares.	<u>ب</u>

obligations         for         convertible         specified         under specified         specified         under specified         specified         under specified		anny Sector							Γ
Image         obligations         for         convertible         securities         SP         of (LODR)           non-convertible         securities         SP         of (EEI (LODR)         Regulation)         Regulation)           ord(segulation)         33 offkon-submission offsock         Nutree         Num-submission of Nut.         Regulation, 2015.         Regulation, 2015.           of(SEII (LODR)         impact of audit publication with the stood publication with the stood submission         statement of impact of auditsubmitted the financial availability to the financial results for the financi		R CANO. 22677 55				red.	situa	3	
obligations         for         convertible sourites.         convertible securities.         convertible securities.         convertible securities.         specified securities.         under seguiations, 2013.           offSEB         (LODR) statement         offset         Non-submission         offset         company         hadbue to statement of statement of state statement of statement of statement of statement of state state		X M No 59980	daily newspaper.	situated.		sted entity is	the l		
obligations         for pro-convertible         convertible securities.         convertible securities.         specified non-convertible         specified securities.         Regulation regulations, 2015.           and regulation         35 offono-submission offstock (LODR) statement         Nor-submission         offstel         Nor-submission         offstel         Nor-submission           offSEB         (LODR) statement         offscchange.         Nor-submission         offstel         Nor-submission         Nor-submission           offSEB         (LODR) statement         offscchange.         Nor-submission         Nor-submission         Nor-submission         Nor-submission           2015.         ualification with the stood         statement of impact of audit pailification exchange along with the stood/esults for the financial results for the statement of impact of audit pailification regulations.         Nor-submission         Statement of impact of audit pailification requisites contrast with the stood/esults for the financial results for the financial results for the financial results for the financial results for the financial results.         Narch, 2022.         Statement of impact of audit regulation go the submitted along with the financial results.           SEB         (LODR) result indiversity and regulations, State (LODR) result indiversity and regulations, State (LODR) result indiversity and regulation, submitted in one feglish language         Not         The financial results and tregulation sin future.         The management has itakenO		(app)	in one English language local	entity		ered office of	regis		
obligations         for         convertible         specified         under         specified         under         function           and Regulation         33 ofNon-submission         ofStock         Note:         Non-submission         ofWith         Regulations, 2015.         Regulation, 2016.         Regulation, 2016.         Regulation, 2016.         Regulation, 2015.         Regulation, 2016.         Regulation, 2016.         <		1.2	the same has been published	registered office of		ere	regio		
obligations         for         convertible         specified         index Regulation ST         oppose           orgelegulation         30 dNon-submission ofStock         Note:         Non-submission ofWill.         Regulations, 2015.         Regulation along         Inter-convertible         Regulation along         Regulation along         Regulation with the stock/essults for the financial results for the requisiteSecretary, and the submitted along with the financial results for the financial results fo		9	the whole of India. Whereas,			'n	circul		
obligations         for         convertible         specified         under Regulation securities.         Specified         under Regulation securities.         Specified         under Regulation securities.         Specified         under Regulation securities.         Specified         under Regulation statement of impact         of         Statement of impact         Specified         UORN           or(SEBL         (LOOR)         impact         of         audit         valification         with         Non-submission         off Steel         Non-submission         off The         company         hadbue to         n           2015.         impact         of         audit         qualification         with         the         financial         valification         with         financial         valification			in the whole or substantially	'n		paper	news	-	
obligations         for         convertible         specified         under Regulation           non-convertible         scurities.         Specified         under Regulation           of(SEB)         (LODR)[statement         of Exchange         of audit         valification           valifications.         impact of audit         with         statement of impact         gualification           sexurities.         financial         with         financial         valification           valifications.         impact of audit         valification         with         financial           results         for         the         stock         financial         valification           valifications.         impact of audit         valification         with         financial         valification           valification         with         financial         vest         financial         vest         statement of impact of audit         financial           results         for         financial         vest         financial         vest         statement of impact of audit         financial         vest           valification         vest         financial         vest         financial         vest         audit         vest         audit			daily newspaper circulating	newspaper			local		
obligations         for         convertible securities.         specified securities.         specified specified         under Regulation ST         of SEBI of ST         (LOR)           indRegulation 33 ofMon-submission ofStock securities.         Notice.         Non-submission ofNIL         Non-submission statement of impact of audit qualification with the stock exchange along with financial results for the financial results for the schange ended 31 <sup>st</sup> March, 2012.         Non-submission impact of audit qualification with the stock financial results for the schange along with ended 31 <sup>st</sup> March, 2022.         Non-submission statement of impact of audit qualification with the stock financial results for results for the schange along with financial results for the schange along with the stock financial results for the schange ended 31 <sup>st</sup> March, 2022.         audit qualification schangement of impact of not able to al march, 2022.           in Regulation 47 offthe seguiations, SEBI (LODR) results of the annual)         Not annual)         The financial results annual)         The financial results, annual)         The management has taken published in one           published in one published in one         finantial published in one         If any, were required to be published in alleast one         The financial results annual)         The management has the published in alleast one	ומעבו נוסבווובווני		English language national				Englis		
obligations         for non-convertible         convertible securities.         specified         under splation         specified         under splation           indregulation 33 ofNon-submission ofStock or(SEB (LODR) statement         Notice.         Non-submission         Non-submission         Non-submission         of         Non-submission         financial varial pavailability         qualification         with         the statement of impact         qualification         Natch, 2022.         Natch, 2022.         Natch, 2022.         Natch, 2022.	dvorticement		published in atleast one			d	publis		
obligations         for non-convertible         convertible securities.         convertible securities.         specified         under Regulation specified         specified         under Regulation           indRegulation 33 of Non-submission         wotice.         Non-submission         Regulations, 2015.         Regulations, 2015.         Regulations, 2015.         Regulations, 2015.         Regulations, 2015.         Non-submission         of audit qualification         with         the stock         statement of impact of audit qualification         with the stock         nancial qualified         qualification         with the stock         statement of impact of audit submitted         the financial qualified           2015.         qualification         with         financial         results for the financial         financial results for the financial results for the financial results for the financial year         march, 2022.         statement of impact of not able to al."           2015.         ended 31 <sup>st</sup> March, 2022.         ended 31 <sup>st</sup> March, 2022.         audit qualification could the same. not be submitted along with the financial year         not be submitted along with the financial results.           2015.         financial view         financial results for financial results for the financial results.         mode         mode         mode         mode         mode         mode         financial results.         mode         mode <td< td=""><td></td><td>ł.</td><td>if any, were required to be</td><td>ed in</td><td></td><td></td><td>annua</td><td></td><td></td></td<>		ł.	if any, were required to be	ed in			annua		
obligations         for non-convertible         convertible securities.         specified securities.         under securities.         specified securities.         Non-submission securities.         of (SEB securities.         Non-submission securities.         of (SEB securities.         Non-submission statement of impact qualification with the stock financial results for the sechange along with financial results for the financial vear ended 31 <sup>st</sup> March, 2022.         under statement of impact financial results for the financial vear ended 31 <sup>st</sup> March, 2022.         March, 2022.         2022.         with the financial results audit qualification could the same. audit qualification could the same. and to usbe to along with the financial results, 2022.         mancial results, 2023.         mancial results, 2023.         mancial results, 2023.         manci	foo/cho		opinion(s) or reservation(s),						
obligations         for non-convertible         convertible         specified         under         Regulation           andRegulation 33 ofNon-submission ofStock         Notce.         Non-submission ofNIL         Regulations, 2015.         Regulations, 2015.         Regulations, 2015.         Regulation with the stock         Non-submission         offNL         Non-submission         offIne         company         hadDue         to <nn< td="">           2015.         Impact of audit         statement of impact         financial         results for         the stock         financial results for         the financial qualified           with         financial         year         ended 31<sup>st</sup>         March, 2022.         with gualification         could the same.         not be submitted         audit         qualification         could the same.         not be submitted         audit         qualification         could the same.         not be submitted         audit         qualification         co</nn<>	handburgeniens	a		(both quarterly and imposed.			ations,	a g	
obligations         for non-convertible         convertible securities.         specified under Regulation           andRegulation 33 ofNon-submission ofStock of(SEBI         Notice.         Non-submission ofNII.         Regulations, 2015.         ofThe         company         hadDue         to           2015.         Impact         of audit qualification         Notice.         Non-submission         ofNII.         Non-submission         ofThe         company         hadDue         to           2015.         Impact         of audit qualification         with         the stock         statement of impact         qualification         with the stock         statement of impact         qualification         with the stock         financial results for         the financial qualified           with         financial         results for         the financial vear         ended 31 <sup>st</sup> March, 2022.         within the requisite Secretary,           financial         year         ended 31 <sup>st</sup> March, 2022.         audit qualification could the same.         not be submitted along           with         financial         year         ended 31 <sup>st</sup> March, 2022.         mot be submitted along           with         financial         year         ended 31 <sup>st</sup> March, 2022.         not be submitted along <tr< td=""><td>hent</td><td>2</td><td></td><td>of the companybeen</td><td>Applicable</td><td>of</td><td></td><td>Newspapers.</td><td></td></tr<>	hent	2		of the companybeen	Applicable	of		Newspapers.	
obligations     for non-convertible     convertible     securities.     specified     under     Regulation       and Regulation 33 of Non-submission of Stock of (SEBI     (LODR)     statement     of Stock     Notice.     Non-submission     Regulations, 2015.       Regulations, of (SEBI     (LODR)     statement     of fexchange.     Notice.     Non-submission     Non-submission       2015.     qualification     with     the     statement of impact     qualification     with the stock       exchange     along     with     the     statement of impact     qualification     with the stock       with     financial     results     for     the     financial     results     for       results     for     the     financial     year     ended     31 <sup>st</sup> March, 2022.       2022.     2022.     2022.     and the stock     financial     financial     financial		ille illaliagenicite has career	lindricial results,	e financial resultsNo Tine	Not	financialNil	Regulation 47 of The	Advertisement in	9
obligations     for non-convertible     convertible securities.     convertible securities.     specified     under     Regulation       and Regulation 33     ofNon-submission     ofStock     Notice.     Non-submission     ofNil.     Regulations, 2015.       of(SEBI     (LODR)     Impact     of     audit     Non-submission     Non-submission       2015.     Impact     of     audit     audit     qualification     with     the     statement     of audit     qualification     qualification     with     the stock     financial     results     for     the     along     with     the stock     financial     results     for     financial     results     for     financial     year     ended     31st     March, 2022.       2022. <t< td=""><td>no to financial</td><td>In tuture.</td><td>· -</td><td></td><td></td><td></td><td></td><td></td><td></td></t<>	no to financial	In tuture.	· -						
obligations     for non-convertible     convertible securities.     convertible securities.     specified     under     Regulation       and Regulation 33     ofNon-submission     ofStock     Notice.     Non-submission     S7     of     (SEBI     (LO Regulations, 2015.     Impact     of     audit     Non-submission     Regulations, 2015.     Regulations, 2015.     Non-submission     Regulation     Non-submission     Statement of impact     of audit qualification     Non-submission     statement of impact     of audit qualification     Non-submission     statement of impact     qualification     with the s       2015.     qualification     with     financial     results for     financial     results for     financial     results for       with     financial     year     ended     31 <sup>st</sup> March,     2022.     2022.     2022.     2022.									-
obligationsforconvertiblespecifiedunderRegulationand Regulation 33ofNon-submission ofStockNotice.Non-submission ofNil.Securities.Securities.and Regulation 33ofNon-submission ofStockNotice.Non-submission ofNil.Non-submissionof(SEBI(LODR)statementofExchange.of auditstatement of impactNon-submission2015.impactof auditwiththestatement of impactqualification with the stockthestockexchangealongwith the stockfinancial results forwithfinancialfinancialresults forfinancial results forresultsforthefinancialyearendedfinancialyearended31 <sup>st</sup> March, 2022.March, 2022.		ensured to be more vigilant					2022.		
obligations     for non-convertible     convertible     securities.     securities.       andRegulation 33 of Non-submission ofStock of(SEBI     (LODR)statement     ofExchange.     Notice.     Non-submission ofNil.     Regulations, 2015.       Regulations, 2015.     Impact of audit qualification with the     stock stock     Notice.     Non-submission ofNil.     Non-submission statement of impact     Non-submission statement of impact       with     financial     exchange     along the financial     with     the stock financial     financial     results for the financial     financial     results for financial     financial     results for financial     financial     warch, 2022.       ended 31 <sup>st</sup> March, 2022.     2022.     2022.     March, 2022.     March, 2022.		management							
obligations       for       convertible       specified       specified       under Regula         andRegulation 33 of Non-submission ofStock       Notice.       Non-submission ofNil.       S7 of (SEBI (LOR)         of(SEBI (LODR)       statement       ofExchange.       Notice.       Non-submission ofNil.       Regulations, 2015.         2015.       impact of audit       of audit       with the stock       statement of audit qualification       qualification with the s         kexchange       along       with the stock       financial results for       financial results for         with       financial       the financial year       march, 2022.       March, 2022.		with the financial results.				1st M	ended		
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obligations       for       convertible       specified under Regulation         non-convertible       non-convertible       securities.       57 of (SEBI (LODR)         and Regulation 33 of Non-submission of Stock       Notice.       Non-submission of Nil.       Non-submission       of The company       had Due to no         of (SEBI (LODR)       LODR) statement       of Exchange.       statement of impact       statement of impact       statement of impact         of (SEBI (LODR) statement       of Exchange.       statement of impact       statement of impact       statement of impact	VNBQMC	lear ended 31 <sup>st</sup> March Co	within professional within				1004	financial results.	
obligations       for       convertible       specified under Regulation         non-convertible       securities.       57 of (SEBI (LODR)         securities.       securities.       Securities.         andRegulation 33 ofNon-submission ofStock       Notice.       Non-submission ofNil.       Non-submission         ofNon-submission ofStock       Notice.       Non-submission       ofIThe       company       hadDue       to         andRegulation 33 ofNon-submission       ofIthe       company       hadDue       to       no	Jalified		qualification with the stock				(LODR)	preparation of	
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obligations     for     convertible     specified     under     Regulation       non-convertible     securities.     57     of     (SEBI     (LODR)       securities.     Regulations, 2015.     Image: 200 minipage     Image: 200 minipage	to	company		of	Notice	hmission ofStock			
obligations for convertible specified under Reg non-convertible securities. 57 of (SEBI		-	Regulations, 2015.			ies.	securit		
obligations for convertible specified under Reg			of (SEBI	securities.		nvertible	non-co	securities	
			under Keg	convertible			obligat	non-convertible	
for principal obligations for non- convertible securities as	0		securities	obligations for non-			princip	obligations for	

Z of No fine has The minimum promoter Due to the sale of shares Due ť

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

the requisite complianceshareholding.							
note of the same so that promoters							ing Room
The management has takenminimum						2	
(ICDR) Regulations, 2018. maintenance of							
prescribed under SEBIcomply with the							
	Regulations, 2018.			the company.			
	prescribed under	company.		shareholding in			
	a societa a made			promoter	2018.	Shareholding.	
had fallen below the limitbank the minimumthe company the	had fallen belo	charabolding in the imposed		-	מנוטויס,	Promoter	
shareholding of the companyliteid under preuße by unepreasing in	shareholding of	Applicable minimum promoterbeen	Applicable	of minimum	Perulations		
Non-maintenance of No Tine Tids The Tillinining province pace to the second state of the the the time of the time	as the minimum	Non-maintenance of No Tine II	Not	(ICDR)Non-maintenance Nil	SEBI (ICDR)	10. Minimum	10.



Nurla Cours