



DATE: 29th June, 2021

REF. : PIL/DVN/JUN/SA/01/2021-22

Security Code No.: 522205	Company Code- PRAJIND
BSE LIMITED PHIROZE JEEJEEBHOY TOWERS, 25TH FLOOR, DALAL STREET, MUMBAI - 400 001 Fax: 022- 22723121/3719/2037/2039/2041/2061	NATIONAL STOCK EXCHANGE OF INDIA LTD. EXCHANGE PLAZA, 5TH FLOOR, PLOT NO. C/1, G BLOCK, BANDRA-KURLA COMPLEX, BANDRA (EAST), MUMBAI - 400 051 Fax: 022 – 66418124/25/26, 2659 8237 / 38.

Subject: Secretarial Compliance Report for the year ended 31st March, 2021.

Dear Sir/Madam,

Please find attached Secretarial Compliance Report for the year ended 31st March, 2021 under Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time.

You are requested to please take the same on your record.

Thanking you,

FOR PRAJ INDUSTRIES LTD.

DATTATRAYA NIMBOLKAR
CHIEF INTERNAL AUDITOR & COMPANY SECRETARY
(M.NO. 4660)

17 June 2021

The Members,

Praj Industries Limited,

Praj Towers

S. No. 274 and 275/2, Bhumkar Chowk-Hinjewadi Road

Hinjewadi,

Pune 411 057

Secretarial compliance report of Praj Industries Limited for the year ended 31st March 2021

[Pursuant to Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015]

I, Vikas Y. Khare, Designated Partner of M/s KANJ & Co. LLP, have examined

- a. all the documents and records made available to us and explanation provided by Praj 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 certification,

for the year ended 31st March 2021 ("Review Period") in respect of compliance with the provisions of:

- a. the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and]
- b. the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the Regulations, circulars, 1 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 (Buyback of Securities) Regulations, 2018. The Company cancelled proposed buyback of shares due to Covid Pandemic. Therefore, the provisions of the regulations mentioned in this para were not applicable during the year under review.
- e. Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;

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- f. Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (Not Applicable to the listed entity during the year under review)
 - g. Securities and Exchange Board of India (Issue and Listing of Nonconvertible and Redeemable Preference Shares) Regulations, 2013; (Not Applicable to the listed entity during the year under review)
 - h. Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
 - i. Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act, 2013 and dealing with the client; and other regulations as applicable) and circulars/ guidelines issued thereunder,
- and based on the above examination, we hereby report that, during the review period:

- a. The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder.
- b. The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from our examination of those records.
- c. No actions taken against the listed entity/ its promoters/ directors/ material subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI/ through various circulars) under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder.
- d. The listed entity has taken the following actions to comply with the observations made in previous reports: Not Applicable

For KANJ & CO LLP
Company Secretaries


Vikas Khare

Partner

FCS No.: 3541 C P No.: 2107

Place: Pune, Date: 17th June 2021

UDIN: F003541C000478400