

30.05.2022

BSE Limited,  
Phiroze Jeejeebhoy Towers,  
Dalal Street,  
MUMBAI – 400 001

Scrip Code – 541400

**Sub: Submission of Annual Secretarial Compliance Report for the Financial Year 2021-22.**

Dear Sirs,

In terms of SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019, and Pursuant to Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations 2015, please find enclosed herewith an Annual Secretarial Compliance Report for the financial year ended March 31, 2022 issued by Ms. Yuti Nagarkar, Practicing Company Secretary.

We request you to kindly take the same on your record.

Thanking you,

Yours faithfully,  
For **ZIM Laboratories Limited**



**(Piyush Nikhade)**  
**Company Secretary and Compliance Officer**



Encl: As above

**ZIM LABORATORIES LIMITED**

www.zimlab.in | info@zimlab.in | CIN: L99999MH1984PLC032172

Works: B-21, 22, MIDC Area, Kalmeshwar - 441501 Dist. Nagpur,  
Maharashtra, India. ☎ +91.7118.271370 | Fax: +91.7118.271470

Regd. office: Sadoday Gyan, (Ground Floor), Opp. NADT, Nelson Square,  
Nagpur -440013. Maharashtra, India. ☎ +91.712.2588070



**YUTI NAGARKAR**  
(L.L.B., F.C.S.)  
COMPANY SECRETARY

OFFICE ADDRESS : PLOT NO. 181, PADMAJA APARTMENT NEAR JAIN MANDIR, LAXMI NAGAR NAGPUR- 440022  
Tel. No. 0712-2226656 / Mobile No. - 9373371217 / Email - csyutinagarkar@gmail.com

SECRETARIAL COMPLIANCE REPORT OF  
ZIM LABORATORIES LIMITED  
FOR THE YEAR ENDED ON 31st MARCH, 2022

To,  
ZIM LABORATORIES LIMITED  
Sadoday Gyan (Ground Floor),  
Opp. NADT, Nelson Square  
Nagpur MH 440013 IN

I, Yuti Nagarkar have examined:

- (a) All the documents and records made available to me and explanation provided by ZIM LABORATORIES LIMITED(CIN: L99999MH1984PLC032172)("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 on 31st March, 2022 ("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, 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; (Not Applicable to the listed entity 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 listed entity during the review period)**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 to the extent applicable
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not Applicable to the listed entity during the review period)**
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (h) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **(Not Applicable to the listed entity during the review period)**
- (i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

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

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

Sr. No	Compliance Requirement(Regulations/ circulars /guidelines including specific clause)	Deviations	Observations/ Remarks of The Practicing Company Secretary
1.	Regulation 29(2) The intimation required under 29(1), shall be given at least two working days in advance, excluding the date of the intimation and date of the meeting: Provided that intimation regarding item specified in clause (a) of sub-regulation (1), to be discussed at the meeting of board of	Delay of 2 days in furnishing prior intimation about the meeting of the board of directors held on 31.01.2022	The Company has intimated the Stock Exchange under Regulation 29 of SEBI(LODR) Regulations, 2015 for the Board Meeting to be scheduled on 31.01.2022 on 27.01.2022 (3 days prior to the meeting) instead of 25.01.2022.



directors shall be given atleast five days in advance (excluding the date of the intimation and date of the meeting), and such intimation shall include the date of such meeting of board of directors.		
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- (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 my examination of those records.
- (c) The following are the details of 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:

Sr. No.	Action taken by	Details of violation	Details of action taken E.g. fines, Warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
1	BSE Limited	Regulation 29(2) Delay in furnishing prior intimation about the meeting of the board of directors held on 31.01.2022	Fine of Rs. 10,000 plus GST as applicable.	The company has paid the fine levied by Stock exchange and the Board of Directors have noted the same in their meeting held on 30.03.2022.

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



Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
Not Applicable				



**Yuti Nagarkar**  
**Practicing Company Secretary**  
 FCS No. 9317  
 CP No. 10802  
 PR: 1344/2021  
 UDIN:F009317D000423161  
 Date: 30<sup>th</sup> May, 2022  
 Place: Nagpur




Note: This report is to be read with my letter of even date which is annexed as 'Annexure A' and forms an integral part of this report.

Annexure A

To,  
**ZIM LABORATORIES LIMITED**  
Sadoday Gyan (Ground Floor),  
Opp. NADT, Nelson Square  
Nagpur MH 440013 IN

My report of even date is to be read along with this letter.

- 1) Maintenance of record is the responsibility of the management of the listed entity. My responsibility is to express an opinion on these records based on our verification of the same.
- 2) I have followed the practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of the secretarial records. I believe that the processes and practices I followed provide a reasonable basis for my opinion.
- 3) I have not verified the correctness and appropriateness of financial records and Books of Accounts of the listed entity.
- 4) Wherever required, I have obtained the Management representation about the compliance of SEBI laws, rules and regulations thereof.
- 5) The compliance of the provisions of SEBI laws, rules, and regulations is the responsibility of management. My examination was limited to the verification of compliances done by the listed entity.
- 6) As regards the books, papers, forms, reports and returns filed by the listed entity under the above-mentioned regulations, the adherence and compliance to the requirements of the said regulations is the responsibility of management. My examination was limited to checking the execution and timeliness of the filing of various forms, reports, returns and documents that need to be filed by the listed entity under the said regulations. I have not verified the correctness and coverage of the contents of such forms, reports, returns and documents.

  
Yuti Nagarkar  
Practicing Company Secretary  
FCS No. 9317  
CP No. 10802  
PR: 1344/2021  
UDIN:F009317D000423161  
Date: 30<sup>th</sup> May, 2022  
Place: Nagpur

