



Orient Abrasives Limited

Ref No.: Orient/Stock Exch/Letter/263

29th June, 2021

**The Dy. General Manager,
Corporate Relations & Services Dept.,
Bombay Stock Exchange Limited
P. J. Towers, Dalal Street,
Mumbai - 400 023.**

**The Dy. Gen. Manager,
National Stock Exchange of India Ltd.,
Corporate Relations Dept.,
Exchange Plaza, Bandra-Kurla Complex,
Bandra (E), Mumbai - 400 051.**

Scrip Code: 504879

Scrip Code: ORIENTABRA

Dear Sir/Madam,

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

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we are submitting herewith the Annual Secretarial Compliance Report of the Company for the year ended 31st March, 2021, issued by Ms. Dipti Gohil, Practicing Company Secretary.

Kindly take the above on record.

Thanking You,

Yours faithfully,

FOR ORIENT ABRASIVES LIMITED

**SEEMA SHARMA
COMPANY SECRETARY & COMPLIANCE OFFICER**

Encl: As above

DIPTI GOHIL
COMPANY SECRETARY

Admin. Off. 403, Vasant Vaibhav, M.G. Road No. 4, Kandivali (West), Mumbai- 400067
Mobile:- 9819606720 Email:- diptigl@gmail.com

SECRETARIAL COMPLIANCE REPORT OF ORIENT ABRASIVES LIMITED
FOR THE YEAR ENDED 31ST MARCH, 2021

I, Dipti Gohil, have examined:

- a) all the documents and records made available to me and explanation provided by ORIENT ABRASIVES LIMITED ("the Listed Entity"),

In view of the second wave of the COVID-19 pandemic and as per the guidance issued by the Institute of Company Secretaries of India (ICSI) for carrying out professional assignments, the Secretarial Compliance Report in term of Regulation 24A of SEBI(Listing Obligations and Disclosure Requirements) Regulations, 2015 was conducted by using appropriate Information Technology tools

- 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 March 31, 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, 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 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 during the Review Period** -

Contd...2.



- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; - **Not Applicable during the Review Period** –
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; - **Not Applicable during the Review Period** –
- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; - **Not Applicable during the Review Period** –
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i) SEBI (Registrars to an Issue and Share Transfer Agents) Regulations 1993, regarding the companies Act, and dealing with the client.
- j) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018

And based on the above examinations and considering the relaxations granted by the Ministry of Corporate Affairs and the SEBI on account of the COVID-19 Pandemic, 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.
- 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) No action has been 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 during the Review Period.

NOTE : It was reported in the previous year Report dtd. 12th June, 2020, that a fine was imposed on the Company by the BSE and the NSE in respect of non-compliance in the constitution of the Audit Committee during part of the years 2018 and 2019. The Company then, had duly reconstituted the Audit Committee w.e.f. 14th may, 2019 and also paid the fines / penalties levied 'Under Protest'.

Thereafter, the Company was directed by the Stock Exchanges, to pay further fine for the period 1st April, 2019 to 13th May, 2019, for the period of 43 days, to which the Company has requested for waiver.



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d) The Listed entity has taken the following actions to comply with the observations made in previous Report. – *kindly refer to aforesaid pt. 'c' -*

I further report that, there was no event of appointment/re-appointment/resignation of statutory auditor of the Company during the review period.




DIPTI GOHIL
ACS - 14736
CP - 11029

Date : 23rd June, 2021

Place: Mumbai

UDIN : A014736C000501948