



30th June, 2020

The Listing Department, The Calcutta Stock Exchange Ltd. 7, Lyons Range, Kolkata - 700001	The Manager The Department of Corporate Services, BSE Limited, P. J. Towers, Dalal Street, Mumbai - 400001	The Manager, The Listing Department, National Stock Exchange of India Limited, Exchange Plaza, Bandra Kurla Complex, Bandra (East), Mumbai - 400051
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Dear Sir,

Re : Annual Secretarial Compliance Report

Pursuant to SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 08.02.2019 and Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 we enclose herewith copy of the Annual Secretarial Compliance Report for the year ended March 31, 2020 certified by Mr. D. C. Sahoo of D. C. Sahoo & Co., Company Secretaries.

Thanking You,

Yours faithfully,

For LINC PEN & PLASTICS LTD.

N. K. Dujari
Chief Financial Officer &
Company Secretary

SECRETARIAL COMPLIANCE REPORT
of
M/S LINC PEN AND PLASTICS LIMITED
FOR THE YEAR ENDED 31st MARCH, 2020

(Pursuant to Circular CIR/CFD/CMD1/27/2019 dated February 8, 2019 for the purpose of Compliance with Regulation 24A of SEBI (LODR), Regulations, 2015 and SEBI Circular No.CIR/CFD/CMD1/27/2019 dated 08/02/2019)

To,
The Members,
M/S LINC PEN & PLASTICS LIMITED
Satyam Towers, 1st Floor,
3, Alipore Road,
Kolkata- 700 027

We have examined:

- (a) all the documents and records made available to us and explanation provided by M/s LINC PEN & PLASTICS 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, 2020 in respect of compliance with the provisions of :
 - (i) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued there under; and
 - (ii) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made there under and the Regulations, circulars, guidelines issued there under by the Securities and exchange Board of India ("SEBI");

The specific Regulations, whose provisions and the circulars/ guidelines issued there under, 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; -N/A
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; -N/A
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; -N/A
- (g) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013; -N/A



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(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 including the provisions with regard to disclosure and maintenance of records required under the said Regulations; 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 there under, 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	As per Regulation 44(3) of the SEBI (LODR) Regulations, 2015 the listed entity shall submit to the stock exchanges, within forty eight hours of conclusion of its General Meeting, details regarding the voting results in the format specified by the Board.	The listed entity submitted the voting result to the stock exchanges, within forty eight hours of receipt of the voting result from the Chairman of the NCLT convened meeting as per the order of NCLT, Kolkata Bench.	The meeting was held as per the order of the NCLT, Kolkata Bench (with Chairman and Scrutiniser appointed by NCLT), the listed entity submitted the voting result to the stock exchanges within 48 hours of receipt of the voting result from the NCLT appointed Chairman of the NCLT convened meeting. It was not feasible / possible for the Company to adhere to the 48 hours deadline as the results were not in possession of the Company.

(b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars / guidelines issued there under insofar as it appears from my / our 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 there under:

Sr. No.	Action taken by NSE and BSE.	Details of violation	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
1	The Company has been fined both by the NSE and BSE.	The listed entity submitted the report to the Stock exchanges within forty eight hours of receipt of the voting result from the NCLT appointed Chairman of the NCLT convened meeting as per the order of NCLT, Kolkata Bench instead of forty eight hours of conclusion of general meeting as mentioned in Regulation 44(3) of the SEBI (LODR) Regulations, 2015	Fine of Rs. 10,000/- plus GST have been imposed each by the NSE and BSE	The meeting was held as per the order of the NCLT, Kolkata Bench and the listed entity submitted the voting result to the stock exchanges within 48 hours of receipt of the voting result from the NCLT appointed Chairman of the NCLT convened meeting.



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(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 31.03.2019	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	There was a violation under Regulation 19 of the SEBI (LODR) Regulations, 2015.	-do-	The Company ensured that the Chairman of NRC will not chair the Board Meeting of the Company, irrespective of whether the Company had NRC meeting during the quarter or not. The NSE has considered the case and refunded the fine of Rs.1,84,000/- plus GST imposed on the Company.	The action taken by the Company is appropriate.

For D. C. Sahoo & Co.
Company Secretaries



Place: Kolkata
Date: 29.06.2020


D. C. Sahoo
Proprietor
M. No.: ACS No: 14008
C P No.: 5508

UDIN: AC14008B000401087.