

Norican Group

Shaping Industry

Ref: DIL/SEC/2020-21/12

Date: June 16, 2020

The Listing Manager
The Bombay Stock Exchange Limited,
1st floor, Rotunda Building,
B S Marg, Fort,
Mumbai-400 001

Telephone no: +91 22 2272 1233/1234

Fax no: +91 22 2272 1919

BSE Scrip Code: 500068

Name of the Company: Disa India limited

Dear Sir,

Subject: Annual Secretarial Compliance Report for the year ended March 31, 2020

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, and in compliance with Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019, we are forwarding herewith the Annual Secretarial Compliance Report issued by Mr. Vijayakrishna K T, Company Secretary, for the financial year ended March 31, 2020.

This is for your information and records.

Yours sincerely,

For Disa India Limited



G Prasanna Bairy

Company Secretary & Compliance Officer

Encl: As above

DISA India Limited

Registered office:
5th Floor, Kushal Garden Arcade,
1A Peenya Industrial Area
Peenya 2nd Phase
Bangalore - 560058
Karnataka, INDIA

T: + 91 80 4020 1400-04
F: +91 80 2839 1661
E: bangalore@noricangroup.com
www.disagroup.com
www.wheelabratorgroup.com
CIN: L85110KA1984PLC006116

Manufacturing Facility
Tumkur : No. 28-32, Satyamangala
Industrial Area, Tumkur - 572 104
Karnataka, INDIA
T: +91 816 6602000/01
E: tumkur@noricangroup.com

Manufacturing Facility
Hosakote, Plot No. 50, KIADB
Industrial Area, Hosakote - 652 114,
Karnataka, INDIA
T: +91 80 279171310/27971516
E: hosakote@noricangroup.com

Regional Sales & Service Contact:
New Delhi - delhi@noricangroup.com
Kolkata - kolkata@noricangroup.com
Pune - pune@noricangroup.com
Rajkot - rajkot@noricangroup.com
Parts/Service: cdc.india@noricangroup.com

VIJAYAKRISHNA K T

BBM, LLB, FCS, ACMA

Company Secretary

496/4, II Floor, 10th Cross
Near Bashyam Circle, Sadashivanagar,
Bangalore - 560 080, INDIA
Tel : +91 80 23610847, 41231106
e-mail : vijaykt@vjkt.in
ktvijaykrishna@gmail.com

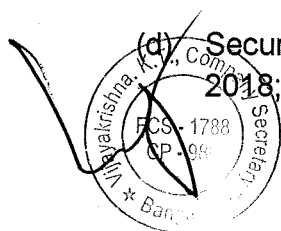
**SECRETARIAL COMPLIANCE REPORT OF
DISA INDIA LIMITED
FOR THE YEAR ENDED 31ST MARCH, 2020**

I, Vijayakrishna K T, Practising Company Secretary have examined all the documents and records made available to us and explanation provided by DISA INDIA LIMITED bearing CIN L85110KA1984PLC006116 and having its Registered Office at 5th Floor, Kushal Garden Arcade 1A, Peenya Industrial Area, Peenya, 2nd Phase, Bangalore KA 560058 IN("the listed entity"), the filings/submissions made by the listed entity to the stock exchanges, website of the listed entity and other document/filing and as may be relevant, which has been relied upon to make this certification for the Financial Year ended 31st March, 2020 ("1st April, 2019 to 31st March, 2020") 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;
- (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;



- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Circulars/Guidelines issued thereunder.

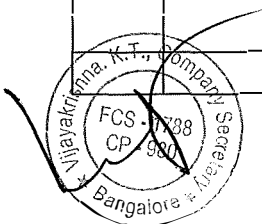
Based on the above examination, I hereby report that, during the Review Period:

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

Sl. No.	Compliance Requirement (Regulations/circulars/Guidelines including specific clause)	Deviations	Observations/Remarks of the Practicing Company Secretary
NIL			

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/guidelines issued thereunder in so far 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:

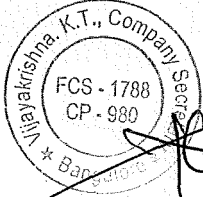
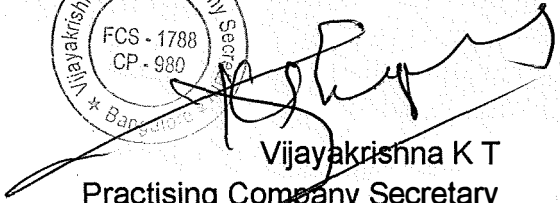
Sl. No.	Action taken by	Details of violation	Details of action taken ex. Fines, warning letter, debarment etc....	Observations/Remarks of the Practicing Company Secretary, if any
NIL				



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

SI. No.	Observations of the Practising 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 Practising Company Secretary on the actions taken by the listed entity
1.	Based on the directions of the Listed Entity, the Registrar and Transfer Agent of the Listed Entity has notified the Stock Exchanges of the Loss/Issue of duplicate Share Certificates	31 st March, 2019	The Listed Entity has notified such events to the Stock Exchange.	The Listed Entity has complied with Regulation 39 (3) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.
2.	The Listed Entity is filing outcome and the financial results in single tab.	31 st March, 2019	The Listed Entity has uploaded the outcome of the Meeting and the Financial Results in separate tabs provided by the Stock Exchanges.	The Listed Entity has complied with Regulation 33(3) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Place: Bengaluru
Date: 03.06.2020



Vijayakrishna K T
 Practising Company Secretary
 FCS No.: 1788 C P No.: 980
 UDIN: F001788B000313979