

Ref: DIL/SEC/2022-23/10  
Date: May 27, 2022

The Listing Manager  
**BSE Limited,**  
Phiroze Jeejeebhoy Towers, Dalal Street,  
**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, 2022.**

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, Practising Company Secretary, for the Financial Year ended March 31, 2022.

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 & Corporate Office:

6<sup>th</sup> Floor, S-604, World Trade Center (WTC), Brigade Gateway Campus, 26/1,  
Dr Rajkumar Road, Malleswaram-Rajajinagar, Bangalore-560 055, Karnataka, India  
T: +91 80 2249 6700 - 031 F: +91 80 22496750 | E: bangalore@noricangroup.com  
W: www.noricangroup.com  
CIN: L85110KA19 84PLC006116 | GST: 29AAACG5030F12Y

Regional Sales:

New Delhi: delhi@noricangroup.com  
Kolkata: kolkata@noricangroup.com  
Pune: pune@noricangroup.com  
Parts & Services: cdc.india@noricangroup.com

Manufacturing Facility:

Tumkur: No. 28-32, Satyamangala Industrial Area, Tumkur - 572104, Karnataka, India.  
T: +91 816 6602000/01, E: tumkur@noricangroup.com  
Hosakote: Plot no 50, KIADB Industrial Area, Hosakote - 562114, Karnataka, India.  
T: +91 80 279171310/27971516, E: hosakote@noricangroup.com

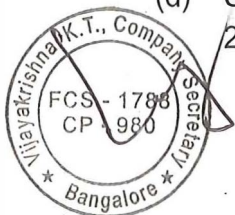
**SECRETARIAL COMPLIANCE REPORT OF  
DISA INDIA LIMITED  
FOR THE YEAR ENDED 31<sup>ST</sup> MARCH, 2022**

I, Vijayakrishna K T, Practising Company Secretary, have examined all the documents and records made available to me and explanations provided by DISA INDIA LIMITED bearing CIN L85110KA1984PLC006116 and having its Registered Office at World Trade Center (WTC), 6<sup>th</sup> Floor, Unit No. S-604, 26/1, Dr Rajkumar Road, Malleswaram, Rajajinagar, Bengaluru, Karnataka, 560055 ("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 31<sup>st</sup> March, 2022 ("1<sup>st</sup> April, 2021 to 31<sup>st</sup> March, 2022") 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 there under; and
- (b) 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;



- (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 there under.

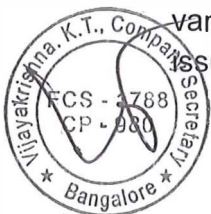
Based on the above examination, I hereby report that, during the Review Period:

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

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

\*With relation to regulation 3 (5) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, the Listed Entity represented that it has robust prevailing system for tracking of sharing the Un-published Price Sensitive Information (UPSI) and is in the process of establishing Structured Digital Database (SDD) in software format.

- (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 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:



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

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

(e)

Sl. 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
			NIL	

Place: Bengaluru  
Date: 25.05.2022



*[Handwritten Signature]*  
Vijaykrishna K T  
Practising Company Secretary  
FCS No.: 1788 C P No.: 980  
UDIN: F001788D000387822