

Date: June 24, 2021

<b>Bombay Stock Exchange Limited</b> <b>Phiroz Jeejeebhoy Towers,</b> <b>Dalal Street, Mumbai – 400023</b>	<b>National Stock Exchange of India Ltd.,</b> <b>Plot No. C/1 'G' Block</b> <b>Bandra – Kurla Complex</b> <b>Bandra East, Mumbai 400051</b>
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**Ref: Scrip Code: BSE: 517536 NSE: ONWARDTEC**

**Subject:** Annual Secretarial Compliance Report for the year ended March 31, 2021

**Ref:** SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019

Respected Madam/Sir,

Pursuant to Regulation 24A of SEBI (LODR) Regulations, 2015 read with Clause 3 (b) (iii) of SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019 and SEBI/HO/CFD/CMD1/P/CIR/2021/556 dated April 29, 2021 we are submitting herewith the Annual Secretarial Compliance Report of the Company for the year ended March 31, 2021 issued by M/s Nilesh A Pradhan & Co., LLP, Company Secretaries and Secretarial Auditor of the Company.

Kindly take the same on record.

Yours' faithfully,

**For Onward Technologies Limited**

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**Dimple Chauhan**  
**Company Secretary**

Encl: As above

# NILESH A. PRADHAN & CO., LLP

## Company Secretaries

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### Secretarial Compliance Report of Onward Technologies Limited for the year ended 31<sup>st</sup> March, 2021

We, Nilesh A. Pradhan & Co., LLP have examined:

- (a) all the documents and records made available to us and explanation provided by Onward Technologies 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 31<sup>st</sup> March,2021 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 as there was no reportable event during the financial year under review.
- (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 as there was no reportable event during the financial year under review

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(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;-Not Applicable as there was no reportable event during the financial year under review

(g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations,2013; -Not Applicable as there was no reportable event during the financial year under review

(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

and circulars/ guidelines issued thereunder;

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 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
	NOT APPLICABLE		

(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 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 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
	Not Applicable			

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

<b>Sr.No</b>	<b>Observations of the Practicing Company Secretary in the previous reports.</b>	<b>Observations made in the Secretarial Compliance Report for the year ended 31<sup>st</sup> March,2020</b>	<b>Action taken by the listed entity if any</b>	<b>Comments of the Practicing Company Secretary on the action taken by the listed entity.</b>
1	<p>As informed and checked by us, there was delay in submission of the disclosures by the Promoter to the Company in one case due to late receipt of the intimation about the transaction.</p> <p>However, the Company acted promptly after receipt of disclosure while submitting the same to the Stock Exchange and ensured that the Company has submitted the necessary disclosures within stipulated time.</p>	<p>There was delay in submission of the above disclosures in two to three cases as required in terms Regulation 7 of the Regulation Securities And Exchange Board Of India (Prohibition Of Insider Trading) Regulations, 2015.</p>	<p>The Company has made timely disclosures of disclosure received from the Insiders to the Stock Exchanges and also informed the Insiders and Connected persons to follow regulations strictly.</p>	<p>The Company has taken appropriated action.</p>

**For Nilesh A. Pradhan & Co., LLP**  
**Company Secretaries**

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**Prajakta V. Padhye**  
**Partner**

**FCS No: 7478.**

**COP No: 7891**

**PR:791/2020**

**UDIN: F007478C000299209**

**Place: Dombivali**  
**Date: 14<sup>th</sup> May,2021**