



Date- May 31, 2024

To,

<b>BSE Limited,</b> <b>Dept. of Corporate Services,</b> Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai – 400 001 <b>Company Code: 505075</b>	<b>National Stock Exchange of India Ltd,</b> <b>Listing Department</b> Exchange Plaza, Bandra Kurla Complex, Bandra (East), Mumbai – 400051 <b>Scrip Symbol: SETCO</b>
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**SUB.: Annual Secretarial Compliance Report Compliance Certificate pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015**

Dear Sir/Madam,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 please find attached Annual Secretarial Compliance Report for the financial Year ended March 31, 2024 issued by M/s Shraavan A. Gupta & Associates, Practicing Company Secretary.

Kindly take the same on your record.

**For Setco Automotive Limited**

**Hiren Vala**  
**Company Secretary**

**SECRETARIAL COMPLIANCE REPORT OF SETCO AUTOMOTIVE LIMITED  
FOR THE FINANCIAL YEAR ENDED 31<sup>ST</sup> MARCH, 2024**

I **CS Shravan A. Gupta**, Proprietor of Shravan A. Gupta & Associates, Company Secretary in whole time practice have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by **SETCO AUTOMOTIVE LIMITED** (hereinafter referred as 'Listed entity'), having its Registered Office at Baroda Godhra Highway Kalol (Panchmahal), NA, Gujarat, India, 389330

Secretarial Review was conducted in a manner that provided me/us a reasonable basis for evaluating the corporate conducts/statutory compliances and to provide my/our observations thereon.

Based on my/our verification of the listed entity's books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Review, I hereby report that the listed entity has, during the review period covering the financial year ended on March 31, 2024 complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter :

- (a) All the documents and records made available to us and explanation provided by **SETCO AUTOMOTIVE 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 financial year ended 31<sup>st</sup> March, 2024 ("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) SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 - Chapter III and Chapter V i.e. Obligations of listed entity which has listed its Non-Convertible Securities;
- (b) SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (c) SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; **(Not applicable to the Company during the Audit Period);**
- (d) SEBI (Buyback of Securities) Regulations, 2018; **(Not applicable to the Company during the Audit Period);**

- (e) SEBI (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **(Not applicable to the Company during the Audit Period);**
- (f) SEBI (Issue and Listing of Non-Convertible Securities) Regulations, 2021 and Operational Circular for issue and listing of Non-convertible Securities, Securitized Debt Instruments, Security Receipts, Municipal Debt Securities and Commercial Paper.;
- (g) SEBI (Prohibition of Insider Trading) Regulations, 2015;
- (h) SEBI (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 and circulars / guidelines issued thereunder;

We, hereby report that, during the Review Period the compliance status of the listed entity is appended as below:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations / Remarks by PCS
1.	<p><b>Secretarial Standards:</b></p> <p>The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI), as notified by the Central Government under section 118 (10) of the Companies Act, 2013 and mandatorily applicable.</p>	Yes	Nil
2.	<p><b>Adoption and timely updation of the Policies:</b></p> <ul style="list-style-type: none"> <li>• All applicable policies under SEBI Regulations are adopted with the approval of Board of Directors of the listed entities.</li> <li>• All the policies are in conformity with SEBI Regulations and have been reviewed &amp; updated on time, as per the regulations / circulars / guidelines issued by SEBI.</li> </ul>	Yes  Yes	Nil  Nil
3.	<p><b>Maintenance and disclosures on Website:</b></p> <ul style="list-style-type: none"> <li>• The Listed entity is maintaining a functional website.</li> <li>• Timely dissemination of the documents / information under a separate section on the website</li> <li>• Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re-</li> </ul>	Yes  Yes  Not Applicable	Nil  Nil  Not Applicable

	directs to the relevant document(s)/ section of the website.		
4.	<p><b>Disqualification of Director:</b></p> <ul style="list-style-type: none"> <li>None of the Director(s) of the Company is / are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.</li> </ul>	Yes	Nil
5.	<p><b>Details related to Subsidiaries of listed entities have been examined w.r.t.:</b></p> <p>(a) Identification of material subsidiary companies</p> <p>(b) Disclosure requirement of material as well as other subsidiaries</p>	Not Applicable Not Applicable	Not Applicable Not Applicable
6.	<p><b>Preservation of Documents:</b></p> <p>The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.</p>	Yes	Nil
7.	<p><b>Performance Evaluation:</b></p> <p>The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.</p>	Yes	Nil
8.	<p><b>Related Party Transactions:</b></p> <p>The listed entity has obtained prior approval of Audit Committee for all related party transactions; or</p> <p>The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved / ratified / rejected by the Audit Committee, in case no prior approval has been obtained.</p>	YES Not Applicable	Not Applicable Not Applicable
9.	<p><b>Disclosure of events or information:</b></p> <p>The listed entity has provided all the required disclosure(s) under Regulation 30</p>	YES	Not Applicable

	along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.		
10.	<b>Prohibition of Insider Trading:</b>  The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	Nil
11.	<b>Actions taken by SEBI or Stock Exchange(s), if any:</b>  No action(s) has been taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder except as provided under separate paragraph herein (**).	Yes	SEBI issued summons to the company, all the directors, CFO and compliance officer against which they have submitted their response. The matter is under scrutiny with SEBI.  BSE and NSE has levied a penalty of Rs. 15,000 + 18% GST and Rs. 5,000 + 18% GST for non-compliance of Regulation 33 for Non-submission of the financial results within the period prescribed and Regulation 23(9) for Related Party Transactions respectively. The Listed entity has paid fine imposed by BSE and NSE.
12.	Resignation of statutory auditors from the listed entity or its material subsidiaries: In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and / or its material subsidiary(is) has / have complied with paragraph 6.1 and 6.2 of section V-D of chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities	NO	NIL
13.	<b>Additional Non-compliances, if any:</b> No additional non-compliance observed for any SEBI regulation / circular / guidance note etc.	Yes (No additional non-compliance observed)	Nil

**Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18<sup>th</sup> October, 2019:**

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations / Remarks by PCS*
1.	<b>Compliances with the following conditions while appointing / re-appointing an auditor</b>	Not Applicable	Not Applicable
	i. If the auditor has resigned within 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter; or	Not Applicable	Not Applicable
	ii. If the auditor has resigned after 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter as well as the next quarter; or	Not Applicable	Not Applicable
	iii. If the auditor has signed the limited review / audit report for the first three quarters of a financial year, the auditor before such resignation, has issued the limited review/ audit report for the last quarter of such financial year as well as the audit report for such financial year.	Not Applicable	Not Applicable
2.	<b>Other conditions relating to resignation of statutory auditor.</b>	Not Applicable	Not Applicable
	i. Reporting of concerns by Auditor with respect to the listed entity/its material subsidiary to the Audit Committee: (a) In case of any concern with the management of the listed entity/material subsidiary such as non-availability of information / non-cooperation by the management which has hampered the audit process, the auditor has approached the Chairman of the Audit Committee of the listed entity and the Audit Committee shall receive such concern directly and immediately without specifically waiting for the quarterly Audit Committee meetings.	Not Applicable	Not Applicable

	<p>(b) In case the auditor proposes to resign, all concerns with respect to the proposed resignation, along with relevant documents has been brought to the notice of the Audit Committee. In cases where the proposed resignation is due to non-receipt of information / explanation from the company, the auditor has informed the Audit Committee the details of information / explanation sought and not provided by the management, as applicable.</p> <p>(c) The Audit Committee / Board of Directors, as the case may be, deliberated on the matter on receipt of such information from the auditor relating to the proposal to resign as mentioned above and communicate its views to the management and the auditor.</p>	Not Applicable	Not Applicable
	<p>ii. Disclaimer in case of non-receipt of information The auditor has provided an appropriate disclaimer in its audit report, which is in accordance with the Standards of Auditing as specified by ICAI / NFRA, in case where the listed entity / its material subsidiary has not provided information as required by the auditor.</p>	Not Applicable	Not Applicable
3.	The listed entity / its material subsidiary has obtained information from the Auditor upon resignation, in the format as specified in Annexure- A in SEBI Circular CIR/CFD/CMD1/114/2019 dated 18 <sup>th</sup> October, 2019.	Not Applicable	Not Applicable

The listed entity has complied with the provisions of the above Regulations and circulars/guidelines issued thereunder.

**As per Annexure-A**

No actions were 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.

**As per Annexure-B**

### **Assumptions & Limitation of scope and Review:**

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial Records and Books of Accounts of the listed entity.
4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

**Shravan A. Gupta & Associates**  
**Practicing Company Secretary**  
***A Peer Reviewed Firm***

SHRAVAN  
AMRITLAL  
GUPTA

Digitally signed by  
SHRAVAN  
AMRITLAL GUPTA  
Date: 2024.05.27  
19:43:57 +05'30'

**Shravan A. Gupta**  
**ACS: 27484, CP: 9990**  
**PRN.:2140/2022**  
**UDIN: A027484F000460664**  
**Date: 27.05.2024**  
**Place: Mumbai**



**ANNEXURE-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)	Regulation / Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Listed entity Secretary	Management Response	Remarks
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)
1.	As per Regulation 33 (3) (d) of SEBI (LODR) Regulations, 2015, the listed entity shall submit annual audited standalone financial results and annual consolidated financial	Regulation 33 (3) (d) of SEBI (LODR) Regulations, 2015.	The listed entity had convened the Board Meeting for consideration of the audited annual financial results for the financial year ended 31 <sup>st</sup> March, 2023 but the results	NSE and BSE	Fine imposed by NSE and BSE	The listed entity had convened the Board Meeting for consideration of the audited annual financial results for the financial year ended 31 <sup>st</sup> March 2023 but the listed entity	BSE and NSE levied a penalty amounting to Rs.15,000+18% GST which was paid by the company on 18/07/2023	The Listed entity has paid the fine imposed by NSE and BSE	The Listed entity has paid the fine imposed by NSE and BSE.	Nil

	results for the financial year within 60 days from the end of the financial year along with the audit report and statement on impact of audit qualifications (applicable only for audit report with modified opinion).		weren't filed within the specified time.			had submitted the financial results after a delay in 3 days.				
2.	As per Regulation 23 (9) of SEBI (LODR) Regulations, 2015, the listed entity shall submit to the stock	Regulation 23 (9) of SEBI (LODR) Regulations, 2015	The statement on half yearly related party transactions as on 31 <sup>st</sup> March, 2023 was filed with NSE and BSE	NSE and BSE	Fine imposed by NSE and BSE	Accordingly, the said half yearly statement on related party transactions should have been filed within 15	NSE and BSE have imposed a fine of Rs. 5,000 + 18% GST, each on the listed entity.	The Listed entity has paid the fine imposed by NSE and BSE	The Listed entity has paid the fine imposed by NSE and BSE.	Nil

<p>exchanges disclosures of related party transactions in the format as specified by the Board from time to time, and publish the same on its website. Provided further that the listed entity shall make such disclosures every six months on the date of publication of standalone and consolidated financial results.</p>					<p>days However, the same was filed with a delay in filing under regulation 23(9) by one day</p>				
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3	Summons under Section 11(2), 11 C(2), 11C(3) and 11 C(5) of the Securities and Exchange Board of India Act, 1992	Section 11(2), 11 C(2), 11C(3) and 11 C(5) of the Securities and Exchange Board of India Act, 1992	The Listed entity and their Directors, CFO and Compliance officer have submitted their response.	SEBI	Summons	SEBI believe that there is reasonable ground that the financial statements of the Listed entity were prepared in a manner detrimental to the investors or the securities market, and/or intermediary or any person associated with the securities market has violated any of the provisions of violated the provisions of the Securities and Exchange	The matter is under scrutiny with SEBI.	The matter is under scrutiny with SEBI.	The Listed entity and their Directors, CFO and Compliance officer have submitted their response.	Nil
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						Board of India Act, 1992 (SEBI Act), Securities contracts (Regulations) Act, 1956 and the provisions as specified in Sec 24 of the Companies Act 2013 for production of documents before the Investigating Authority under Section 11(2) and 11C(2), 11C(3) of the Securities and Exchange Board of India Act, 1992				
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**ANNEXURE-B**

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

Sr. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Regulation / Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations / Remarks of the Practicing Listed entity Secretary	Management Response	Remarks
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)
1.	As per Regulation 33 (3) (d) of SEBI (LODR) Regulations, 2015, the listed entity shall submit annual audited standalone financial results and annual consolidated financial results for the	Regulation 33 (3) (d) of SEBI (LODR) Regulations, 2015.	The listed entity had convened the Board Meeting for consideration of the audited annual financial results for the financial year ended 31 <sup>st</sup> March, 2022 on 28 <sup>th</sup> July, 2022 and had	NSE and BSE	Fine imposed by NSE and BSE	The listed entity had convened the Board Meeting for consideration of the audited annual financial results for the financial year ended 31 <sup>st</sup> March, 2022 on 28 <sup>th</sup> July, 2022 and had submitted the said results to NSE and BSE on 28 <sup>th</sup> July, 2022	NSE have imposed a fine of Rs. 1,50,000 + 18% GST on the listed entity.  BSE have imposed a fine of Rs. 1,50,000 + 18% GST on the listed entity.	The Listed entity has paid the fine imposed by NSE and BSE	The Listed entity has paid the fine imposed by NSE and BSE.	Nil

	financial year within 60 days from the end of the financial year along with the audit report and statement on impact of audit qualifications (applicable only for audit report with modified opinion).		submitted the said results to NSE and BSE on 28 <sup>th</sup> July, 2022			instead of 30 <sup>th</sup> May, 2022 i.e. by a delay of 59 days.				
2.	As per Regulation 23 (9) of SEBI (LODR) Regulations, 2015, the listed entity shall submit to the stock exchanges disclosures of	Regulation 23 (9) of SEBI (LODR) Regulations, 2015	The statement on half yearly related party transactions as on 31 <sup>st</sup> March, 2022 was filed with NSE and BSE on	NSE and BSE	Fine imposed by NSE and BSE	Accordingly, the said half yearly statement on related party transactions should have been filed within 15 days from 6 <sup>th</sup> July, 2022 i.e. 20 <sup>th</sup>	NSE and BSE have imposed a fine of Rs. 5,000 + 18% GST, each on the listed entity.	The Listed entity has paid the fine imposed by NSE and BSE	The Listed entity has paid the fine imposed by NSE and BSE.	Nil

<p>related party transactions in the format as specified by the Board from time to time, and publish the same on its website. Provided further that the listed entity shall make such disclosures every six months within fifteen days from the date of publication of its standalone and consolidated financial results.</p>		<p>28<sup>th</sup> July, 2022. The audited annual financial results for the financial year ended 31<sup>st</sup> March, 2022 was approved by the Board on 6<sup>th</sup> July, 2022.</p>			<p>July, 2022. However, the same was filed on 28<sup>th</sup> July, 2022 i.e. on a delay of 8 days.</p>				
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3.	As per Regulation 17 (2) of SEBI (LODR) Regulations, 2015, the Board of Directors shall meet at least four times a year, with a maximum time gap of 120 days between any two meetings.	Regulation 17 (2) of SEBI (LODR) Regulations, 2015	The gap between 2 Board Meetings held on 12 <sup>th</sup> February, 2022 and 6 <sup>th</sup> July, 2022 is more than 120 days.	NSE and BSE	Fine imposed by NSE and BSE	Same as column (4)	NSE and BSE have imposed a fine of Rs. 10,000 + 18% GST, each on the listed entity.	The Listed entity has paid the fine imposed by NSE and BSE	The Listed entity has paid the fine imposed by NSE and BSE.	Nil
4.	As per Regulation 29 of SEBI (LODR) Regulations, 2015, the listed entity shall give prior intimation to stock exchange about the meeting of the Board of	Regulation 29 of SEBI (LODR) Regulations, 2015	The listed entity had submitted the intimation in respect of convening the Board Meeting on 26 <sup>th</sup> April, 2021 in respect of raising of	NSE and BSE	Fine imposed by NSE and BSE	The listed entity had submitted the intimation in respect of convening the Board Meeting on 26 <sup>th</sup> April, 2021 in respect of raising of funds to NSE and BSE on 23 <sup>rd</sup> April, 2021 instead of 21 <sup>st</sup>	NSE and BSE have imposed a fine of Rs. 10,000 + 18% GST, each on the listed entity.	The Listed entity has paid the fine imposed by NSE and BSE.	The Listed entity has paid the fine imposed by NSE and BSE.	Nil

	Directors in which the Board shall consider raising of funds, atleast 2 working days in advance excluding the date of intimation and date of the Board Meeting.		funds to NSE and BSE on 23 <sup>rd</sup> April, 2021.			April, 2021 i.e. by a delay of 2 days.				
5.	As per Regulation 29 of SEBI (LODR) Regulations, 2015, the listed entity shall give prior intimation to stock exchange about the meeting of the Board of Directors in which the	Regulation 29 of SEBI (LODR) Regulations, 2015	The listed entity had submitted the intimation in respect of convening the Board Meeting on 8 <sup>th</sup> August, 2021 in respect of approval of financial results for	NSE and BSE	Fine imposed by NSE and BSE	The listed entity had submitted the intimation in respect of convening the Board Meeting on 8 <sup>th</sup> August, 2021 in respect of approval of financial results for the quarter ended 31 <sup>st</sup> March, 2021 to NSE and BSE on 6 <sup>th</sup> August,	NSE and BSE have imposed a fine of Rs. 10,000 + 18% GST, each on the listed entity.	The Listed entity has paid the fine imposed by NSE and BSE	The Listed entity has paid the fine imposed by NSE and BSE.	Nil

	Board shall consider approval of financial results atleast 2 working days in advance excluding the date of intimation and date of the Board Meeting.		the quarter ended 31 <sup>st</sup> March, 2021 to NSE and BSE on 6 <sup>th</sup> August, 2021.			2021 instead of 4 <sup>th</sup> August, 2021 i.e. by a delay of 2 days.				
6.	As per Regulation 33 of SEBI (LODR) Regulations, 2015, the Listed entity is required to submit the audited annual financial results within 60 days of the end of the financial year.	As per Regulation 33 of SEBI (LODR) Regulations, 2015 and SEBI circular bearing reference no. SEBI/HO/CFD /CMD1/P/CIR /2021/556 dated 29 <sup>th</sup> April, 2021	The listed entity had convened the Board Meeting for consideration of the audited annual financial results for the financial year ended 31 <sup>st</sup> March, 2021 on 8 <sup>th</sup> August,	NSE and BSE	Fine imposed by NSE and BSE	The listed entity had convened the Board Meeting for consideration of the audited annual financial results for the financial year ended 31 <sup>st</sup> March, 2021 on 8 <sup>th</sup> August, 2021 and had submitted the said results to NSE and BSE on	NSE have imposed a fine of Rs. 1,45,000 + 18% GST on the listed entity  BSE have imposed a fine of Rs. 1,95,000 + 18% GST	The Listed entity has paid the fine imposed by NSE and BSE	The Listed entity has paid the fine imposed by NSE and BSE.	Nil

	On account of COVID 19, SEBI vide its circular bearing reference no. SEBI/HO/CFD/CMD1/P/CIR/2021/556 dated 29 <sup>th</sup> April, 2021 had extended the last date of submission of the audited annual financial results for the financial year ended 31 <sup>st</sup> March, 2021 from 30 <sup>th</sup> May, 2021 to 30 <sup>th</sup> June, 2021.		2021 and had submitted the said results to NSE and BSE on 8 <sup>th</sup> August, 2021.			8 <sup>th</sup> August, 2021 instead of 30 <sup>th</sup> June, 2021 i.e. by a delay of 39 days.				
7.	As per Regulation 33 of SEBI (LODR) Regulations, 2015, the Listed entity is	Regulation 33 of SEBI (LODR) Regulations, 2015	The listed entity had convened the Board Meeting for consideratio	NSE and BSE	Fine imposed by NSE and BSE	The listed entity had convened the Board Meeting for consideration	NSE have imposed a fine of Rs. 95,000 + 18% GST on the	The Listed entity has paid the fine imposed by NSE and BSE	The Listed entity has paid the fine imposed by NSE and BSE.	Nil

	required to submit the quarterly and year to date financial results within 45 days of the end of every quarter.		n of un-audited quarterly and year to date financial results for quarter ended 30 <sup>th</sup> September, 2021 on 17 <sup>th</sup> December, 2021 and was submitted to NSE and BSE on 17 <sup>th</sup> December, 2021			of un-audited quarterly and year to date financial results for quarter ended 30 <sup>th</sup> September, 2021 on 17 <sup>th</sup> December, 2021 and was submitted to NSE and BSE on 17 <sup>th</sup> December, 2021 instead of 14 <sup>th</sup> November, 2021 i.e. by a delay of 33 days.	listed entity  BSE have imposed a fine of Rs. 95,000 + 18% GST			
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8.	As per regulation 6 (1) of SEBI (LODR), Regulations, 2015, the listed entity is required to appoint a qualified Listed entity Secretary as its Compliance Officer.	Regulation 6 (1) of SEBI (LODR), Regulations, 2015	The Listed entity has not appointed Listed entity Secretary as Compliance Officer for the quarter ended 31 <sup>st</sup> December, 2018	NSE and BSE	Fine imposed by NSE and BSE	The Listed entity has not appointed Listed entity Secretary as Compliance Officer for the quarter ended 31 <sup>st</sup> December, 2018	NSE has imposed a fine of Rs. 1,08,560 + 18% GST on the Listed entity  BSE has imposed a fine of Rs. 1,08,560 + 18% GST	NSE and BSE has imposed a fine for the quarter ended 31 <sup>st</sup> December, 2018. The Listed entity has requested NSE and BSE to waive the fine. BSE has not responded to the request. NSE has waived the fine. The Listed entity has appointed Mr. Chandra Kant Sharma as Listed entity Secretary and Compliance Officer w.e.f.	The Listed entity has appointed Mr. Chandra Kant Sharma as Listed entity Secretary and Compliance Officer w.e.f. 6 <sup>th</sup> May, 2019.  Till that time, the compliances of the Listed entity were managed by Listed entity Secretary of Group Companies.  The Listed entity has not paid the fine to BSE.	Nil
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								6 <sup>th</sup> May, 2019. The Listed entity has not paid the fine to BSE.		
9.	As per regulation 6 (1) of SEBI (LODR), Regulations, 2015, the listed entity is required to appoint a qualified Listed entity Secretary as its Compliance Officer.	Regulation 6 (1) of SEBI (LODR), Regulations, 2015	The Listed entity has not appointed Listed entity Secretary as Compliance Officer for the quarter ended 31 <sup>st</sup> March, 2019	NSE and BSE	Fine imposed by NSE and BSE	The Listed entity has not appointed Listed entity Secretary as Compliance Officer for the quarter ended 31 <sup>st</sup> March, 2019	NSE has imposed a fine of Rs. 17,000 + 18% GST on the Listed entity  BSE has imposed a fine of Rs. 17,000 + 18% GST	NSE and BSE has imposed a fine for the quarter ended 31 <sup>st</sup> March, 2019. The Listed entity has requested NSE and BSE to waive the fine. BSE has not responded to the request. NSE has waived the fine. The Listed entity has appointed Mr. Chandra Kant Sharma	The Listed entity has appointed Mr. Chandra Kant Sharma as Listed entity Secretary and Compliance Officer w.e.f. 6 <sup>th</sup> May, 2019.  Till that time, the compliances of the Listed entity were managed by Listed entity Secretary of Group Companies.	Nil

									as Listed entity Secretary and Compliance Officer w.e.f. 6 <sup>th</sup> May, 2019. The Listed entity has not paid the fine to BSE.	The Listed entity has not paid the fine to BSE.	
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**Shravan A. Gupta & Associates**  
**Practicing Company Secretary**  
*A Peer Reviewed Firm*

SHRAVAN | Digitally signed  
by SHRAVAN  
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19:44:30 +05'30'

**Shravan A. Gupta**  
**ACS: 27484, CP: 9990**  
**PRN.:2140/2022**  
**UDIN: A027484F000460664**  
**Date: 27.05.2024**  
**Place: Mumbai**