

*Ref: INP/20-21/BSE/ASC
Date: 23rd June, 2021*

To
BSE Limited
Dy. General Manager
Corporate Relationship Department
P. J. Towers, Dalal Street
Mumbai- 400 001

Ref: COMPANY CODE: 501298

*Sub: Regulation 24A- Annual Secretarial Compliance Report for the year ended
March 31, 2021*

Dear Sir,

With reference to the above subject, we herewith enclose the Annual Secretarial Compliance Report of the Company for the year ended 31st March, 2021 issued by the Secretarial Auditor of the Company.

Kindly take the same on record.

Thanking You,

Yours faithfully,

For *INDUSTRIAL & PRUDENTIAL INVESTMENT CO. LTD.*,



*Ayan Datta
Company Secretary*

Encl: As above.

ANNUAL SECRETARIAL COMPLIANCE REPORT
OF
INDUSTRIAL AND PRUDENTIAL INVESTMENT COMPANY LIMITED
FOR THE YEAR ENDED 31.03.2021

We have examined:

- (a) all the documents and records made available to us and explanation provided by Industrial and Prudential Investment Company 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 31.03.2021 (“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) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (b) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (c) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009;



- (d) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- (e) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;
- (f) The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements), 2015

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
1.	Regulation 34 of SEBI(LODR) Regulations, 2015	Non- Submission of the annual report for the financial year March 2020 within the period prescribed under this regulation.	The Company had submitted its reply indicating filing of the said statement once again with the exchange and details of payment of fines for Non- Compliance with Regulations of SEBI(LODR) Regulations, 2015.



2.	Regulation 23(9) of SEBI (LODR) Regulations, 2015	Non- Compliance with disclosure of related party transaction on consolidated basis for the half year ended September 2020 within the period prescribed under this regulation.	The Company had submitted its reply indicating filing of the said statement once again with the exchange and details of payment of fines for Non- Compliance with Regulations of SEBI(LODR) Regulations, 2015.
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(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 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 the 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 Letters, debarment, etc.	Observation/remarks of the Practicing Company Secretary, if any.
1.	BSE Ltd.	Non- Submission of the annual report for the financial year March 2020 within the period prescribed under this regulation.	Fine of INR 22,000 (Rupees Twenty Two Thousand Only) including GST @18% was imposed by the BSE Ltd.	This is caused due to some technical issues in the system. However, the company has duly submitted the statement to the BSE again. The company had contested the levy of fine and has deposited the amount under protest.



2.	BSE Ltd.	Non- Compliance with disclosure of related party transaction on consolidated basis for the half year ended September 2020 within the period prescribed under this regulation.	Fine of INR 2,06,500 (Rupees Two Lakhs Six Thousand Five Hundred Only) including GST @18% was imposed by the BSE Ltd.	<p>This is caused due to some technical issues in the system.</p> <p>However, the company has duly submitted the statement to the BSE again.</p> <p>The company had contested the levy of fine and has deposited the amount under protest.</p>
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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 end <i>(The years are to be mentioned)</i>	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
NIL				



Mamta Binani & Associates

COMPANY SECRETARIES

- (e) The Listed entity has complied with the provisions of SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019, in terms of Para 6(A) and 6(B) of the said circular and has suitably modified the terms of appointment of its Statutory Auditors for the financial year ending March 31, 2021.

For Mamta Binani And Associates

Madhuri Pandey

CS Madhuri Pandey

Partner

CP No.: 20723

Membership No: A55836



UDIN: A055836C000479974

Place: Kolkata

Date: 16.06.2021

