

A **TATA** Enterprise

22nd July 2022

BSE Ltd. (BSE)
Listing Compliance Department
P J Towers, Dalal Street, Mumbai -400001

Scrip Code: 504112

Sir/Madam,

Sub: Fines as per SEBI circular no. SEBI/HO/CFD/CMD/CIR/P/2020/12 dated January 22, 2020

This is with reference to your email dated 14th July 2022 regarding captioned subject.

We submit as under:-

1. The Regulation 23(9) of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015 was amended requiring to submit the disclosures of Related Party Transactions (RPTs) within 15 days (earlier it was 30 days) from the publication of its standalone and consolidated financial results.
2. As required under the SEBI circular, the subject matter of delay in compliance as identified and indicated by the Exchange and subsequent action taken by the Exchange in this regard was placed before the Board meeting held on 18th July 2022. While noting the observations of BSE, the Board commented as under:
 - i) There was no clarity as to whether the reduced period of submission under regulation 23(9) from 30 days to 15 days is applicable for financial results published after 1st April 2022 or it is applicable for publishing of financial results for the period commencing from 1st April 2022. The Company has complied with the Compliance under Regulation 23(9), but only an **unintentional delay of 12 days**.
 - ii) RPTs entered were at Arm's length basis and in the Ordinary Course of Company's Business.
 - iii) The aggregate amount involved in the RPTs is not material and the transactions are not prejudicial or detrimental to the interest of any Stakeholders.
 - iv) The Exchange be requested to condone the delay of 12 days and waive the fine for the reasons mentioned in (i) to (iii) above.

Please take the aforesaid on record.

For Nelco Limited



Girish V. Kirkinde
Company Secretary & Head-Legal

