



AGARWAL INDUSTRIAL CORPORATION LIMITED

Petrochemicals (Manufacturers & Traders of Bitumen & Bituminous Products) • Logistics for Bitumen & LPG • Wind Mills.

CIN NO.: L99999MH1995PLC084618

May 27, 2022

To,

BSE Limited,
Department of Corporate Services,
1st Floor, P. J. Towers,
Dalal Street, Fort,
Mumbai – 400 001
Scrip Code: 531921

National Stock Exchange of India Limited,
Listing Department,
Exchange Plaza,
Bandra-Kurla Complex,
Bandra (East),
Mumbai – 400 051
Symbol: AGARIND; Series : EQ

Dear Sir,

Sub: Annual Secretarial Compliance Report under Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

Pursuant to Regulation 24A of SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015, read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019, please find enclosed herewith the Annual Secretarial Compliance Report issued by Mr. P. M. Vala, Proprietor of P. M. Vala & Associates, Company Secretary in Practice, for the Financial Year ended March 31, 2022.

We request you to kindly take the above information on record

Yours faithfully,

For Agarwal Industrial Corporation Limited


Dipali Pitale
Company Secretary & Compliance Officer



Encl: a/a





P. M. VALA & ASSOCIATES

COMPANY SECRETARIES

Shop No.1, Laxmi Sadan CHS. Ltd., Opp. New Rose Villa,
Daji Ramchandra Road, Charai, Thane (West) - 400 601
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**ANNUAL SECRETARIAL COMPLIANCE REPORT
OF
AGARWAL INDUSTRIAL CORPORATION LIMITED
(CIN: L99999MH1995PLC084618)
FOR THE FINANCIAL YEAR ENDED 31ST MARCH' 2022**

[Pursuant to circular CIR/CFD/CMD1/27/2019 dated February 08, 2019 for the purpose of compliance with Regulation 24A of SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015]

To,
Agarwal Industrial Corporation Limited
CIN: L99999MH1995PLC084618
Eastern Court, Unit No. 201-202
Plot No.12, V. N. Purav Marg, S. T. Road,
Chembur, Mumbai - 400 071

I, **Pradyumansinh M. Vala**, Proprietor of **P. M. Vala & Associates**, Company Secretaries have conducted the Secretarial Compliance Audit of the applicable SEBI (Securities and Exchange Board of India) Regulations and the circulars/guidelines issued thereunder for the Financial Year ended **31st March'2022** for **Agarwal Industrial Corporation Limited** ("the Company"). The Audit was conducted in a manner that provided me with a reasonable basis for evaluating the statutory compliances and expressing my opinion thereto.

I have examined:

- all the documents and records made available to me and explanation provided by **Agarwal Industrial Corporation Limited** ("the Company")
- the filings/submission made by the Company to the stock exchanges,
- website of the Company,
- any other documents/filings, as may be relevant, which has been relied upon to make this certification,

for the year ended **31st March' 2022** ("Review Period") in respect of compliance with the provisions of:

- the Securities and Exchange Board of India Act'1992 ("SEBI Act") and the Regulations, Circulars, Guidelines issued thereunder; and



- ii. the Securities Contracts (Regulation) Act'1956 (“SCRA”) rule made thereunder and Regulations, Circulars, Guidelines issued thereunder by the Securities and Exchange Board of India (“SEBI”);
- iii. the following Regulations prescribed under the Securities and Exchange Board of India Act, 1992 (“SEBI Act”) and the circulars/guideline issued thereunder, have been examined:-
 - (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 (Depositories and Participants) Regulations, 2018; **(Not Applicable to the Company during the Audit Period)**
 - (d) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
 - (e) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **(Not Applicable to the Company during the Audit Period);**
 - (f) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **(Not Applicable to the Company during the Audit Period);**
 - (g) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not Applicable to the Company during the Audit Period);**
 - (h) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **(Not Applicable to the Company during the Audit Period);**
 - (i) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
 - (j) Securities and Exchange Board of India Registrars to an issue and Share Transfer Agents Regulations. 1993 regarding the Companies Act and dealing with Client:
 - (k) Other regulations as applicable and Circulars/Guidelines issued thereunder;

Based on the above my examination and verification of the documents and records produced to me and accordingly to the information and explanations given to me by the Company, I report that:

- (a) The Company 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	Observation/Remark of the Practising Secretary Company
		None	



- (b) The Company has maintained proper record under the provisions of the above Regulations and Circulars/Guidelines issued thereunder insofar as it appear from my examination of those records.
- (c) There were no instances for actions to be taken against the Company/its promoters/directors/material subsidiaries either by SEBI or by Stock Exchange (including under the Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts/Regulation and Circulars/Guidelines issued thereunder ,except in respect of matters specified below:-


Sr. No.	Action taken by	Details of violation	Details of action taken e.g. fines, warning letter, debarment, etc	Observations/remark of the Practicing Company Secretary, if any
None				

- (d) The Company was not required to take any action with regard to compliance with the observations made in previous reports as the same was not applicable :

Sr. No.	Observation of the Practicing Company Secretary in the Previous reports	Observation made in the Secretarial Compliance report for the year ended 2021 (The years are to be mentioned)	Action taken by the listed entity, if any	Comments of the Practicing Company Secretary on the action taken by the listed entity
None				

- (e) The reporting of clause 6(A) and 6(B) of the Circular No. CIR/CFD/CMD1 /114/2019 dated October 18, 2019 issued by the Securities and Exchange Board of India on “Resignation of Statutory Auditor from Listed Entities and their Material Subsidiaries” is not applicable during the Review Period.

**For P. M. Vala & Associates,
Company Secretaries
ICSI Unique Code: I2001MH250600
Peer Review No.1884/2022**


**P. M. Vala
(Proprietor)
FCS No.5193, COP No.4237
UDIN: F005193D000400159**



Place: **Thane**
Date: **26th May'2022**