

June 30, 2021

To,

|  |   |
|--|---|
| <b>BSE LIMITED</b><br>P.J. Towers,<br>Dalal Street,<br>Mumbai - 400 001<br><br><b>BSE Scrip</b><br><b>Code:</b> 532684 | <b>National Stock Exchange of India Ltd</b><br>Exchange Plaza,<br>Bandra Kurla Complex,<br>Bandra East, Mumbai - 400 051<br><br><b>NSE Symbol:</b> EKC<br><b>NSE Series:</b> EQ |
|--|---|

Dear Sir/Madam,

Sub: Annual Secretarial Compliance Report for the year ended March 31, 2021.

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and SEBI circular CIR/CFD/CMD1/27 /2019 dated February 8, 2019, we are forwarding herewith the Annual Secretarial Compliance Report for the financial year 2020-2021.

You are requested to kindly take the above information on record.

Thanking you,

For **Everest Kanto Cylinder Limited**

*Bnk*

**Bhagyashree Kanekar**

**Company Secretary & Compliance Officer**



## EVEREST KANTO CYLINDER LIMITED

**Manufacturers  
of High Pressure  
Seamless  
Gas Cylinders**

Registered Office :  
204, Raheja Centre,  
Free Press Journal Marg,  
214, Nariman Point,  
Mumbai - 400 021.

CIN L29200MH1978PLC020434

Tel. : +91-22-4926 8300 / 01

Fax : +91-22-2287 0720

Website : [www.everestkanto.com](http://www.everestkanto.com)





# AASHISH K. BHATT & ASSOCIATES

## Practicing Company Secretaries

**Aashish K. Bhatt**  
B.Com., A.C.S., PGDSL

SECRETARIAL COMPLIANCE REPORT OF  
EVEREST KANTO CYLINDER LIMITED  
FOR THE YEAR ENDED 31<sup>ST</sup> MARCH, 2021

*[Pursuant to SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 08<sup>th</sup> February, 2019]*

To,  
Everest Kanto Cylinder Limited,  
204, Raheja Centre, Free Press Journal Marg,  
214, Nariman Point Mumbai – 400021.

I, have examined:

- a) all the documents and records made available to us and explanation provided by **Everest Kanto Cylinder Limited ("the listed entity")**,
- a) the filings / submissions made by the listed entity to the stock exchanges,
- b) website of the listed entity,
- c) 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 ("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) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI Listing Regulation");

- b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 – Not Applicable;
- 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;
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 - Not Applicable;
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 – Not Applicable;
- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 – Not Applicable;
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

And circulars/ guidelines issued thereunder and based on the above examination, I 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.      | As per SEBI (Prohibition of Insider Trading) Regulations, 2015, trading of Equity Shares of the Company by Designated Persons during the period of closure of trading window is restricted and the listed entity |            | Violations observed under SEBI (Prohibition of Insider Trading) Regulations, 2015 for trading by Designated Persons during the period of closure of trading window. Penalty was levied by the Company |

A

|    |   |  |   |
|----|---|--|---|
|    | shall promptly intimate the same to stock exchange(s) and SEBI.   |  | however, there was delay in prompt submission to stock exchange(s) and SEBI.  |
| 2. | Pursuant to regulation 23(9) of SEBI Listing Regulations, the listed entity shall submit disclosures of Related Party Transactions on a consolidated basis within 30 days from the date of publication of its standalone and consolidated financial results for the half year.  |  | Delay in submission of disclosures of Related Party Transactions on a consolidated basis for half year ended March 31, 2020.  |
| 3. | As per regulation 30 of SEBI Listing Regulations, Outcome of meeting of Board of Directors in which Financial Results have been approved are to be disclosed to Stock Exchange(s) within 30 minutes of the closure of meeting and disclosure under regulation 30 are to be disclosed to Stock Exchange(s) within 24 hours from the occurrence of event. |  | Delay in submission of Outcome of Board meetings during the period under review and disclosure w.r.t. investment and disinvestment under regulation 30 to Stock Exchange(s).  |
| 4. | Regulation 33(3)(d) of SEBI Listing Regulations states in case of audit reports with unmodified opinion(s), the listed entity shall furnish a declaration to that effect to the Stock Exchange(s) while publishing the annual audited financial results.  |  | The Company has not furnished a separate declaration of unmodified opinion while publishing the annual Audited Financial Results for the year ended 31.03.2020 although the Outcome of the Board Meeting dated July 10, 2020 specifies that the Auditors Opinion is unmodified. |
| 5. | As per Regulation 47 of SEBI Listing Regulations, the listed entity shall publish notice of meeting of  |  | Intimation under regulation 29 of SEBI Listing Regulation for board meeting to be held on 10.07.2020  |

|   |  |
|---|--|
| the board of directors where financial results shall be discussed and notices given to shareholders by advertisement. | was not published in English or regional language daily newspaper and there was a delay in newspaper publication of Annual General Meeting Notice given to shareholders. |
|---|--|

- a) 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 examination of those records.
- b) 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. |
|---------|-----------------|----------------------|---|--|
|         | Nil             | Nil                  | Nil   | Nil  |

- c) 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 ended 31.03.2020 | Actions taken by the listed entity, if any | Comments of the Practicing Company Secretary on the actions taken by the listed entity |
|--|--|--|--|--|
| Necessary actions were taken by Company w.r.t. observations in previous reports. |  |  |  |  |



On account of pandemic "COVID 2019" and nationwide lockdown imposed by governments, the audit process has been modified, wherein certain documents/records etc. were verified in electronic mode and have relied on the representations received from the Company for its accuracy and authenticity.

**For Aashish K. Bhatt & Associates  
Company Secretaries**



**Aashish Bhatt**

**Proprietor**

**ACS No.: 19639, COP No.: 7023**

**UDIN: A019639C000547936**

**Place: Mumbai**

**Date: 24.06.2021**

