

Monday, May 29, 2023

To,

**Bombay Stock Exchange Ltd**  
Corporate Relationship Department  
1st Floor, New Trading Ring,  
Rotunda Building, P.J. Towers,  
Dalal Street, Fort, Mumbai- 400001  
(Scrip Code No: 500418)

**National Stock Exchange of India Ltd**  
Exchange Plaza, C-1, Block G,  
Bandra Kurla Complex,  
Bandra (E), Mumbai – 400 051  
(Scrip Code: Tokyo Plast)

**Subject: Submission of Annual Secretarial Compliance Report for the Financial Year ended March 31, 2023.**

Dear Sir,

Pursuant to regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) (Amendment) Regulations, 2018, kindly find enclosed the Annual Secretarial Compliance Report for the year ended March 31, 2023.

Request you to kindly take the same on record

Thanking you,

Yours faithfully,

**For Tokyo Plast International Limited**

**Rekha Bagda**  
Company Secretary

**TOKYO PLAST** *International Ltd.*

# **Ms. I. Javeri**

**Practicing Company Secretary**

**Office:**

**Office No.: 03, A Wing, 9<sup>th</sup> Floor,**

**Pinnacle Corporate Park**

**BKC CST Link Rd., MMRDA Area,**

**Bandra Kurla Complex,**

**Bandra East, Mumbai - 400 051**

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## **SECRETARIAL COMPLIANCE REPORT OF TOKYO PLAST INTERNATIONAL LIMITED FOR THE FINANCIAL YEAR ENDED 31<sup>ST</sup> MARCH, 2023**

I have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by **Tokyo Plast International Limited** (hereinafter referred as "the listed entity"), having its Registered Office at 363/1(1,2,3), Shree Ganesh Industrial Estate, Kachigam Road, Daman - 396210, Daman and Diu, India. Secretarial Review was conducted in a manner that provided me a reasonable basis for evaluating the corporate conducts / statutory compliances and expressing my opinion thereon.

Based on my verification of the listed entity's minutes books, forms and returns filed and other relevant records maintained by the listed entity and also the information provided by the listed entity, its officers and authorized representatives during the conduct of Secretarial Review, I hereby report that in my opinion, the listed entity has, during the review period covering the financial year ended on 31<sup>st</sup> March, 2023, prima facie complied with the statutory provisions listed hereunder and also that the listed entity has proper Board processes and compliance mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

**I, I. Javeri, Practicing Company Secretary, have examined:**

- (a) the documents and records made available to me and explanation provided by the listed entity,
- (b) the filings / submissions made by the Listed Entity to the stock exchanges,
- (c) website of the Listed Entity and
- (d) any other documents / filings, as may be relevant, which has been relied upon to make this certification,



**for the financial year ended 31<sup>st</sup> March, 2023 (“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 (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (b) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 - (Not Applicable during the review period);
- (c) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 - (Not applicable during the review period);
- (e) The Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 - (Not applicable during the review period);
- (f) The Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 - (Not applicable during the review period);
- (g) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (h) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- (i) 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 - (Not applicable during the review period);



and based on the above examination, I hereby report that, during the Review Period:

I. (a) (\*\*) The Listed Entity has prima facie complied with the applicable provisions of the above Regulations and circulars / guidelines issued thereunder, except in respect of the 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 Company Secretary	Management Response	Remarks
1.	Structural Digital Database as per the Regulation 3(5) & 3(6) of the SEBI (Prohibition of Insider Trading) Regulations, 2015	Regulation 3(5) & 3(6) of the SEBI (Prohibition of Insider Trading) Regulations, 2015	The Company has maintained the Structural Digital Database internally with proper lock in till they installed the software in December, 2022.	None	N.A.	The Company has maintained the Structural Digital Database internally with proper lock in till they installed the software in December, 2022.	Nil	The Company has maintained the Structural Digital Database internally with proper lock in till they installed the software in December, 2022.	The Company has maintained the Structural Digital Database internally with proper lock in till they installed the software in December, 2022.	-
2.	Filing of the Outcome of the Board Meetings under Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements)	Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements)	The Company has not filed the Outcome of the Board Meeting held on 10-11-2022 for approval of unaudited financial results for the quarter ended 30-	None	N.A.	The Company has delayed in filing the Outcome of the Board Meeting held on 10-11-2022 for approval of the unaudited financial results for the quarter ended 30-09-2022 under	Nil	The Company has delayed in filing the Outcome of the Board Meeting held on 10-11-2022 for approval of the unaudited Financial Results for the quarter ended 30-09-2022 under Regulation 30 of the SEBI	There was issue with internet connectivity and internal server of the Company and due to that, there was a delay for 30 minutes.	-



Regulations, 2015 within 30 minutes of conclusion of the Board Meeting.	ments) Regulations, 2015	09-2022 within 30 minutes of conclusion of the Board Meeting.			Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.		(Listing Obligations and Disclosure Requirements) Regulations, 2015.		
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(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 Company Secretary	Management Response	Remarks
1	Filing of the Statement of Investor Complaints under Regulation 13(3) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.	Regulation 13(3) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.	Delayed Submission	None	N.A.	The Company has delayed in filing of the Statement of Investor complaints for the quarter ended 31 <sup>st</sup> March, 2021 and 31 <sup>st</sup> December, 2021 under Regulation 13(3) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.	Nil	The Company has delayed in filing of the Statement of Investor complaints for the quarter ended 31 <sup>st</sup> March, 2021 and 31 <sup>st</sup> December, 2021 under Regulation 13(3) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.	No Action was required to be taken in current year.	-
2.	Filing of the Outcome of the Board Meetings under Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements)	Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations,	Delayed Submission	None	N.A.	The Company has delayed in filing the Outcome of the Board Meeting held for approval of the Financial Results for the quarter ended 31 <sup>st</sup> March, 2021 under Regulation 30 of the	Nil	The Company has delayed in filing the Outcome of the Board Meeting held for approval of the Financial Results for the quarter ended 31 <sup>st</sup> March, 2021 under Regulation 30 of the SEBI	No Action was required to be taken in current	-



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	Regulations, 2015.	2015.				SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.		(Listing Obligations and Disclosure Requirements) Regulations, 2015.	year.	
3	Filing of the Annual Report along with the Notice of the Annual General Meeting under Regulation 34 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.	Regulation 34 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.	Delayed Submission	None	N.A.	The Company has delayed in submission of the Annual Report along with the Notice of the Annual General Meeting under Regulation 34 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.	Nil	The Company has delayed in submission of the Annual Report along with the Notice of the Annual General Meeting under Regulation 34 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.	No Action was required to be taken in current year.	-
4	Intimation of the Record Date under Regulation 42 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.	Regulation 42 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.	Delayed submission	None	N.A.	The Company has delayed in submission of intimation of the Record Date under Regulation 42 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.	Nil	The Company has delayed in submission of intimation of the Record Date under Regulation 42 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.	No Action was required to be taken in current year.	-
5	Publication of the Notice of the Annual General Meeting in the Newspapers under Regulation 47 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.	Regulation 47 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.	Delayed compliance	None	N.A.	The Company has delayed in publication of the Notice of the Annual General Meeting in the Newspapers under Regulation 47 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.	Nil	The Company has delayed in publication of the Notice of the Annual General Meeting in the Newspapers under Regulation 47 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.	No Action was required to be taken in current year.	-



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6	Maintaining the Website under Regulation 46 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.	Regulation 46 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.	Partial Compliance	No	N.A.	The Company has not uploaded all the details on its website as required to be uploaded under Regulation 46 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.	Nil	The Company has not uploaded all the details on its website as required to be uploaded under Regulation 46 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.	The Company has uploaded all the required details / documents.	-
7	Closure of Trading Window under Regulation 4 of the SEBI (Prohibition of Insider Trading) Regulations, 2015.	Regulation 4 of the SEBI (Prohibition of Insider Trading) Regulations, 2015.	Delayed Submission	No	N.A.	The Company has delayed in filing of intimation of Closure of Trading Window for the quarter ended 30 <sup>th</sup> June, 2021.	Nil	The Company has delayed in filing of intimation of Closure of Trading Window for the quarter ended 30 <sup>th</sup> June, 2021.	No Action was required to be taken in current year.	-
8	Filing of Shareholding Pattern under Regulation 31 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.	Regulation 31 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.	Delayed Submission	No	N.A.	The Company has delayed in filling of Shareholding Pattern for the quarter ended 31 <sup>st</sup> March, 2021 under Regulation 31 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.	Nil	The Company has delayed in filling of Shareholding Pattern for the quarter ended 31 <sup>st</sup> March, 2021 under Regulation 31 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015. As informed by the Company, the delay was due to technical error on the portal.	Delay was due to technical error on the portal and no Action was required to be taken in current year.	-



9	Filing of Compliance Certificate under 74(5) of the SEBI (Depository and Participants) Regulations, 2018.	Regulation 74(5) of the SEBI (Depository and Participants) Regulations, 2018.	Delayed Submission	None	N.A.	The Company has delayed in filing of Compliance Certificate for the quarter ended 31 <sup>st</sup> December, 2021 under 74(5) of the SEBI (Depository and Participants) Regulations, 2018.	Nil	The Company has delayed in filing of Compliance Certificate for the quarter ended 31 <sup>st</sup> December, 2021 under 74(5) of the SEBI (Depository and Participants) Regulations, 2018.	No Action was required to be taken in current year.	-
10	Publication of the Financial Results in the Newspapers under Regulation 47 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.	Regulation 47 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.	Delayed Publication	None	N.A.	The Company has delayed in publication of the Financial Results for the quarter ended 31 <sup>st</sup> December, 2021 in the Newspapers under Regulation 47 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.	Nil	The Company has delayed in publication of the Financial Results for the quarter ended 31 <sup>st</sup> December, 2021 in the Newspapers under Regulation 47 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015. As informed by the Company, it has submitted within the time but the delay was from the end of publishers.	The Company has submitted within the time but the delay was from the end of publishers and no Action was required to be taken in current year.	-
11	System Driven Disclosures under the SEBI Circular No.: SEBI/HO/ISD/ISD/CI	SEBI Circular No.: SEBI/HO/ISD/ISD/CI	Delayed Compliance	None	N.A.	The Company has delayed in filing of the details of the Directors, Member(s) of Promoter Group and	Nil	The Company has delayed in filing of the details of the Directors, Member(s) of Promoter Group and	Delay was due to technical	-





	R/P/2020/168 dated 09 <sup>th</sup> September, 2020.	0/168 dated 09 <sup>th</sup> September, 2020.				Designated Person(s) to the Depository.		Designated Person(s) to the Depository. As informed by the Company, the delay was due to technical error on the portal.	error on the portal and no Action was required to be taken in current year.	
12	The SEBI Circular No.: CIR/CFD/CMD1/114/2019 dated 18 <sup>th</sup> October, 2019.	SEBI Circular No.: CIR/CFD/CMD 1/114/2019 dated 18 <sup>th</sup> October, 2019	Not Complied	No ne	N.A.	The Company has not complied with the terms and conditions of the SEBI Circular No.: CIR/CFD/CMD1/114/2019 dated 18 <sup>th</sup> October, 2019 in respect of Resignation of Statutory Auditors of the Company.	Nil	The Company has not complied with the terms and conditions of the SEBI Circular No.: CIR/CFD/CMD1/114/2019 dated 18 <sup>th</sup> October, 2019 in respect of Resignation of Statutory Auditors of the Company.	The Company has assured that they will take care of such compliances in future.	-
13	The SEBI Circular No.: CIR/CFD/CMD/4/2015 dated 09 <sup>th</sup> September, 2015.	SEBI Circular No.: CIR/CFD/CMD /4/2015 dated 09 <sup>th</sup> September, 2015.	Not Disclosed	No ne	N.A.	The Company has not disclosed all the details as required to be disclosed under the SEBI Circular No.: CIR/CFD/CMD/4/2015 dated 09 <sup>th</sup> September, 2015 in respect of Appointment and Resignation of Statutory Auditors of the Company.	Nil	The Company has not disclosed all the details as required to be disclosed under the SEBI Circular No.: CIR/CFD/CMD/4/2015 dated 09 <sup>th</sup> September, 2015 in respect of Appointment and Resignation of Statutory Auditors of the Company.	The Company has assured that they will take care of such compliances in future.	-



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14	The SEBI Circular No.: SEBI/HO/DDHS/CIR/P/2018/144 dated 26 <sup>th</sup> November, 2018.	SEBI Circular No.: SEBI/HO/DDHS/CIR/P/2018/144 dated 26 <sup>th</sup> November, 2018.	Delayed filing	No	N.A.	During the review period, the Company has delayed in filing of disclosure under SEBI Circular No.: SEBI/HO/DDHS/CIR/P/2018/144 dated 26 <sup>th</sup> November, 2018 for the financial year ended 31 <sup>st</sup> March, 2021.	Nil	During the review period, the Company has delayed in filing of disclosure under SEBI Circular No.: SEBI/HO/DDHS/CIR/P/2018/144 dated 26 <sup>th</sup> November, 2018 for the financial year ended 31 <sup>st</sup> March, 2021.	No Action was required to be taken in current year.	-
15	Annual Report in XBRL mode as per BSE Circular No.: LIST/COMP/40/2018-19 dated 08 <sup>th</sup> February, 2019 and NSE Circular No.: Ref No: NSE/CML/2019/26 dated 01 <sup>st</sup> November, 2019.	BSE Circular No.: LIST/COMP/40/2018-19 dated 08 <sup>th</sup> February, 2019 and NSE Circular No.: Ref No: NSE/CML/2019/26 dated 01 <sup>st</sup> November, 2019.	Not Filed	No	N.A.	The Company has not filed Annual Report for the financial year ended 31 <sup>st</sup> March, 2021 in XBRL mode as required under BSE Circular No.: LIST/COMP/40/2018-19 dated 08 <sup>th</sup> February, 2019 and NSE Circular No.: Ref No: NSE/CML/2019/26 dated 01 <sup>st</sup> November, 2019.	Nil	The Company has not filed Annual Report for the financial year ended 31 <sup>st</sup> March, 2021 in XBRL mode as required under BSE Circular No.: LIST/COMP/40/2018-19 dated 08 <sup>th</sup> February, 2019 and NSE Circular No.: Ref No: NSE/CML/2019/26 dated 01 <sup>st</sup> November, 2019.	The Company has assured that they will take care of such compliances in future.	-
16	The BSE Circular No.: LIST/COMP/54/2019-20 dated 20 <sup>th</sup> January, 2020.	BSE Circular No.: LIST/COMP/54/2019-20 dated 20 <sup>th</sup> January, 2020.	Not Complied	No	N.A.	The Company has not updated the Information regarding Statutory Auditors of the Company as required under the BSE Circular No.: LIST/COMP/54/2019-20 dated 20 <sup>th</sup> January, 2020.	Nil	The Company has not updated the Information regarding Statutory Auditors of the Company as required under the BSE Circular No.: LIST/COMP/54/2019-20 dated 20 <sup>th</sup> January, 2020.	The Company has updated the require information.	-



Note: The observations made in the Annual Secretarial Compliance Report for the financial year ended 31<sup>st</sup> March, 2021 were already mentioned in the previous year's report (i.e. report for the financial year ended 31<sup>st</sup> March, 2022) and no action was required to be taken.

**II. 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
<b>1.</b>	<b>Compliances with the following conditions while appointing/re-appointing an auditor</b>		
	<p>a. 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</p> <p>b. 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</p> <p>c. 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.</p>	<p>N.A.</p> <p>Issued for Quarter ended before resignation</p> <p>N.A.</p>	<p>M/s U. V. Shah &amp; Co. (Firm Reg. No.: 109814W), the Statutory Auditor of the Company resigned with effect from 27<sup>th</sup> August, 2022 due to expiry of a valid peer review certificate issued by the Institute of Chartered Accountants of India.</p>
<b>2.</b>	<b>Other conditions relating to resignation of statutory auditor</b>		
	<p>i. Reporting of concerns by Auditor with respect to the listed entity / its material subsidiary to the Audit Committee:</p> <p>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</p>		<p>M/s U. V. Shah &amp; Co. (Firm Reg. No.: 109814W), the Statutory Auditor of the Company resigned with effect</p>



	<p>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.</p> <p>b. In case the auditor proposes to resign, all concerns with respect to the proposed resignation, along with relevant documents have 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> <p>ii. Disclaimer in case of non-receipt of information:</p> <p>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>	<p>N.A.</p> <p>N.A.</p> <p>N.A.</p> <p>N.A.</p>	<p>from 27<sup>th</sup> August, 2022 due to expiry of a valid peer review certificate issued by the Institute of Chartered Accountants of India.</p>
<p>3.</p>	<p>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.</p>	<p>Yes</p>	<p>N.A</p>



III. I 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><u>Secretarial Standards:</u></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	The Company has prima facie complied.
2	<p><b><u>Adoption and timely updation of the Policies:</u></b></p> <p>i. All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities.</p> <p>ii. All the policies are in conformity with SEBI Regulations and have been reviewed &amp; timely updated as per the regulations / circulars / guidelines issued by SEBI.</p>	Yes  Yes	N.A.  N.A.
3	<p><b><u>Maintenance and disclosures on Website:</u></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-directs to the relevant document(s)/ section of the website.</li> </ul>	Yes  Yes  Yes	N.A.  N.A.  N.A.



4	<b><u>Disqualification of Director:</u></b>  None of the Directors of the Company is disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	Yes	N.A.
5	<b><u>Details related to Subsidiaries of listed entities have been examined w.r.t.:</u></b>  (a) Identification of material subsidiary Companies.  (b) Requirements with respect to disclosure of material as well as other subsidiaries.	N.A.  N.A.	As informed by Company, it does not have any material subsidiary Company.
6	<b><u>Preservation of Documents:</u></b>  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.	Yes	N.A.
7	<b><u>Performance Evaluation:</u></b>  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.	Yes	N.A.
8	<b><u>Related Party Transactions:</u></b>  (a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or  (b) 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.	Yes  N.A.	N.A.  N.A.

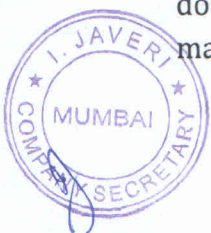


9	<b><u>Disclosure of events or information:</u></b>  The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.	No	Provided in separate paragraph I (a) above (**)
10	<b><u>Prohibition of Insider Trading:</u></b>  The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	No	Provided in separate paragraph I (a) above (**)
11	<b><u>Actions taken by SEBI or Stock Exchange(s), if any:</u></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.	N.A.	No Actions were taken against the listed entity
12	<b><u>Additional Non-compliances, if any:</u></b>  No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	No	Provided in separate paragraph I (a) above (**)

IV. During the review period, BSE Limited and National Stock Exchange of India Limited had on 29<sup>th</sup> June, 2022 approved the application filed by the Company / Promoters for reclassification of some of the promoter shareholders as the public shareholders.

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

- a. The compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.



- b. My responsibility is to report based upon my examination of relevant documents and information. This is neither an audit nor an expression of opinion.
- c. I have not verified the correctness and appropriateness of financial Records and Books of Accounts of the listed entity.
- d. 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.

**Date: 29<sup>th</sup> May, 2023**

**Place: Mumbai**

**UDIN: A002209E000404721**



**Ms. I. Javeri**

**Practicing Company Secretary**

**ACS No.: 2209 / COP No.: 7245**

**Peer Review Cert. No.: 2922/2023**