

To

Date: May 23, 2022

The Corporate Relationship Department
BSE Limited
PhirozeJeejeebhoy Towers
Dalal Street
Mumbai- 400001

Dear Sir,

Reg: Annual Secretarial Compliance Report for the year ended 31.03.2022

Please find attached herewith Secretarial Compliance Report for the year ended 31st March 2022 under Regulation 24A of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015.

Please treat this as our formal disclosure under Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

This is for your information and record.

Thanks & Regards,
Duncan Engineering Limited



Rajib Kumar Gope
Company Secretary



Duncan Engineering Limited

(Formerly known as Schrader Duncan Limited)

Registered Office & Plant

F-33, Ranjangaon MIDC, Karegaon, Tal. Shirur, Dist. Pune - 412 209. India

Telephone : +91 2138 660-066 Fax : +91 2138 660-067

Email : del@duncanengg.com Web : www.duncanengg.com

CIN : L28991PN1961PLC139151

Secretarial compliance report of DUNCAN ENGINEERING LIMITED for the year ended March 31, 2022 under Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

I have examined:

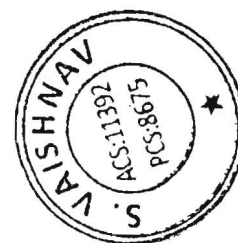
- (a) All the documents and records made available to us and explanation provided by DUNCAN ENGINEERING LIMITED;
- (b) The filings/submissions made by the DUNCAN ENGINEERING LIMITED to the stock exchange;
- (c) Website of the DUNCAN ENGINEERING LIMITED;
- (d) Any other document/filing as may be relevant, which has been relied upon to make this Certification;

For the period ended March 31, 2022 (Review period) in respect of the compliance with the provisions of:

- (a) The Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, Circulars, guidelines issued there under; and
- (b) The Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made there under and the Regulations, circulars, guidelines issued there under 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;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations 2018;
- (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);



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(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;

(i) other regulations as applicable;

And circulars/guidelines issued thereunder.

And based on the above examination, I, report that during the Review Period

a) The listed entity has complied with the provisions of the above Regulation 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	SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	A delay of 7 (seven) days in filing the RPT Report for half year ended March 31, 2021.	There were COVID 19 related exigencies which resulted in this delay.

b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/guidelines issued thereunder in so far as it appears from the examination of those records.

c) The following are the details of actions taken against DUNCAN ENGINEERING LIMITED /its promoters/directors/material subsidiaries either by SEBI or by Stock Exchanges (including standard operating procedures issued by SEBI through various circulars) under the aforesaid Acts/Regulations and circulars/guidelines issued thereunder:



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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.
1	BSE limited	Delay in filing RPT report under Regulation 23 SEBI (Listing Obligation and Disclosure Requirements) Regulation 2015	A fine of INR 5000 per day for 7 days totaling up to INR 35000 plus taxes as applicable imposed- the same has been paid by the Company.	It is noted that due to some COVID 19 related exigencies at that particular time there was a delay of 7 days in filing /uploading the Related Party Transaction Report as required under Regulation 23 of SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015 for the half year ended March 31, 2021 Hence the Company on receiving a notice was required to pay a fine. The fine has since been paid and thereafter there will no legal repercussions on the Company



S. Vaishnav

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 previous reports	Observations made in the secretarial compliance report for the year ended ...(The years are to be mentioned)	Actions taken by the listed entity, if any.	Comments of the Practicing Company Secretary on the actions taken by the listed entity.
	NOT	APPLICABLE		

Place: PUNE

Date: May 21, 2022

Signature:

S. Vaishnav
S. VAISHNAV

Name of the Practicing Company Secretary
ACS No.11392 C.P. No. 8675



UDIN: A011392D000359401