

20th May 2022

BSE Ltd.
1st Floor, New Trading Ring Rotunda Building,
P J Towers, Dalal Street, Fort
Mumbai 400 001

Stock Code: 513375

National Stock Exchange of India Ltd.
Exchange Plaza, 5th Floor
Plot No. C/1, G Block
Bandra- Kurla Complex,
Bandra (E) Mumbai 400 051
Mumbai 400 051

Stock Code: CARBORUNIV-EQ

Dear Sir/Madam,

Sub: Annual Secretarial Compliance Report for the year ended 31st March 2022.


In terms of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February 2019, we enclose the Annual Secretarial Compliance report issued by M/s. R Sridharan & Associates, Company Secretaries for the year ended 31st March 2022.

Kindly take the above on record.

Thanking you

Yours faithfully

For Carborundum Universal Limited



Rekha Surendhiran
Company Secretary

**SECRETARIAL COMPLIANCE REPORT OF CARBORUNDUM UNIVERSAL LIMITED FOR
THE YEAR ENDED 31STMARCH 2022**

ISIN: INE120A01034

We, **R. SRIDHARAN & ASSOCIATES, Company Secretaries** have examined:

- a) All the documents and records made available to us and explanation provided by **CARBORUNDUM UNIVERSAL LIMITED (CIN: L29224TN1954PLC000318)** (hereinafter referred as "listed company") having its Registered office at **Parry House, 43, Moore Street, Chennai- 600001.**
- b) the filings/ submissions made by the listed entity to the stock exchanges,
- c) website of the listed entity, (website address: <https://www.cumi-murugappa.com>)
- d) any other document/ filing, as may be relevant, which has been relied upon to make this certification, for the year ended **31stMarch 2022** 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 as amended;
- b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 as amended; **(Not applicable during the year under review)**
- c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 as amended;
- d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **(Not applicable during the year under review)**
- e) The Employee Stock Option Plan, 2016 approved under the Securities Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 and the Employee Stock Option Scheme, 2007 approved under the Securities Exchange Board of India (Employee Stock Option Scheme and Employee Stock Purchase Scheme) Guidelines, 1999 and The Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021;



- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (up to 16th August, 2021) and Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **(Not applicable during the year under review)**
- g) Securities and Exchange Board of India (Issue and listing of Non-Convertible and redeemable Preference shares) Regulations, 2013 (up to 16th August, 2021); **(Not applicable during the year under review)**
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- 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 as the Company is not registered as Registrar to an Issue and Share Transfer Agent during the year under review)**
- j) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018; and circulars/ guidelines issued there under;

And based on the above examination, we 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:-

| Sr.No | Compliance Requirement (Regulations/circulars/guidelines including specific clauses) | Deviations | Observations/ Remarks of the Practicing Company Secretary |
|-------|--|------------|---|
| Nil | | | |

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under insofar as it appears from our examination of those records.
- (c) The following are the details of actions taken against the listed entity/ its promoters/ directors/ material subsidiaries(Not applicable to this company) 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 | | | | |





- (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 the previous reports | Observations made in the secretarial compliance report for the year ended | Actions taken by the listed entity if any | Comments of the Practicing Company Secretary on the actions taken by the listed entity |
|--------|--|---|---|--|
| Nil | | | | |

FOR R.SRIDHARAN & ASSOCIATES
COMPANY SECRETARIES



PLACE : CHENNAI
DATE : 9TH MAY, 2022


CS R.SRIDHARAN
C.P NO.3239
FCS.NO.4775
PRNO.657/2020
UIN: S2003TN063400
UDIN: F004775D000288058