

30th May, 2023

To.

The General Manager,

Department of Corporate Services,

BSE Limited.

1st Floor, New Trading Ring,

Rotunda Bldg, P.J. Tower,

Dalal Street,

Mumbai - 400001

BSE Scrip Code: 500083

To,

The Listing Department,

National Stock Exchange of India

Limited,

Exchange Plaza,

Bandra Kurla Complex,

Bandra (E),

Mumbai – 400051

NSE Scrip Code: CENTEXT EQ

Sub:- Annual Secretarial Compliance Report for the year ended March 31, 2023

Dear Sir/Madam,

Pursuant to the Regulations 24A of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019, please find enclosed herewith Annual Secretarial Compliance Report for the year ended March 31, 2023.

Kindly take the same into record.

Thanking you,

Yours faithfully,

For Century Extrusions Limited

RAJAN

SINGH

Digitally signed by RAJAN SINGH

Date: 2023.05.30 14:57:28

+05'3

Rajan Singh

(Company Secretary & Compliance officer)

Encl: as above

Century Extrusions Limited

Regd. & Head Office:
113, Park Street
"N" Block, 2nd Floor
Kolkata -700 016 (W.B.), India
Ph. + 91 (033) 2229 1012/1291
Fax: +91 (033) 2249 5656
E.Mail: century@centuryextrusions.com

Website: www.centuryextrusions.com



Plot

WBIIDC Industrial Growth Centre Plot No. 7A, Sector 'B' NIMPURA

Works:

P.O. : Rakhajungle, Kharagpur - 721 301

Dist. : Paschim Medinipur, West Bengal, India

Ph. : +91 (03222) 233 310/324 Fax : +91 (03222) 233 304

E.mail: works@centuryextrusions.com

CIN: L27203WB1988PLC043705



SHRUTI AGARWAL

PRACTISING COMPANY SECRETARY Mobile: +91-93308 26989

E-mail ID : cs.agarwalshruti@gmail.com

Annual Secretarial Compliance Report of Century Extrusions Limited for the financial year ended 31st March, 2023 (Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015)

To, Century Extrusions Limited 113, Park Street, 'N' Block 2nd Floor, Kolkata-700016

- I, Shruti Agarwal, Practicing Company Secretary, have examined:
 - (a) all the documents and records made available to us and explanation provided by Century Extrusions Limited ("Listed Entity"),
 - (b) the filings/ submissions made by the listed entity to the stock exchanges,
 - (c) website of the listed entity,
 - (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31st 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 (including amendments, modifications from time to time, 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 from time to time;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018, as amended from time to time; [Not applicable during the Review Period]
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, as amended from time to time;
- (d) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; and circulars/ guidelines issued thereunder; as amended from time to time;
- (e) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; applicable during the Review Period]

Office: Marshall House, 2nd Floor, Room No. 240, 33/1, N.S. Road, Kolkata - 700 001

- (f) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 [erstwhile SEBI (Share Based Employee Benefits) Regulations, 2014]; [Not applicable during the Review Period]
- (g) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 [Not applicable during the Review Period]
- (h) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; [Not applicable during the Review Period]
- (i) Securities and Exchange Board of India (Registrar to an issue and Share Transfer Agents) Regulations, 1993
- (j) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018.

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.	Secretarial Standards:	Yes	None
	The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI)		
2.	Adoption and timely updation of the Policies:	Yes	None
	All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities		
	All the policies are in conformity with SEBI Regulations and has been reviewed & timely updated as per the regulations/circulars/guidelines issued by SEBI		
3.	Maintenance and disclosures on Website:	Yes	None
	The Listed entity is maintaining a functional website		
	Timely dissemination of the documents/ information under a separate section on the website		
	 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 		

4.	Disqualification of Director:		
	None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013	Yes	None
5.	To examine details related to Subsidiaries of listed entities: (a) Identification of material subsidiary companies (b) Requirements with respect to disclosure of material as well	N.A.	The Listed Entity does not have any material subsidiary.
	as other subsidiaries		
6.	Preservation of Documents: 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	None
7.	Performance Evaluation: The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations	Yes	None
8.	Related Party Transactions:		
	(a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions	Yes	None
	(b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit committee	N.A.	No such case was reported during the financial year under report.
9.	Disclosure of events or information:	Yes	None
	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.		
10.	Prohibition of Insider Trading:	Yes	None
	The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015		
11.	Actions taken by SEBI or Stock Exchange(s), if any: Action taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including	No	As per Regulation 17(1) of the SEB (LODR), 2015.
	under the Standard Operating Procedures issued by SEBI		the top 2000

through various circulars) under SEBI Regulations and entities listed circulars/ guidelines issued thereunder, during the year 2021-(with effect from April 1, 2020) shall comprise of not less than six directors. Accordingly, Number of the member board was 5 i.e. less than six since the quarter ended September, 2021. Accordingly, the exchanges have imposed penalty vide issued letter: By NSE-1. Letter No. NSE/LIST-SOP/COMB/FIN ES/0825 dated November 22. 2021, for amounting Rs.542800/-(including GST) for the quarter ended September, 2021. Letter No. NSE/LIST-SOP/COMB/FIN ES/0832 dated February 21, 2022, for amounting Rs.542800/-(including GST) for the quarter ended December, 2021. Also the Demat accounts of the



Promoters of the Company has been freezed. By BSE- 1. Exchanges The imposed have penalty vide letter SOPno. CReview-(21-Feb-2022) Received Vide mail dated 21-02-2022. 2.SOP-Reminder-December 2021 Recd. Vide mail 09-03dated Rs. 2022. 542800/-(including GST). for the quarter ended December 2021. Also the demat accounts of the promoters of the company has been freezed. Response The company has appointed two (2) New Directors in their Board dated 11.01.2022. After said the appointment, the board has members. Further the has company submitted on various dated, the waiver application for consideration to waived the

			imposed penalty, to the exchanges and it is still in progress and not resolved yet.
12.	Additional Non-compliances, if any:	Yes	None
	No any additional non-compliance observed for all SEBI regulation/circular/guidance note etc.		

Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as perSEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019:

Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations /Remarks by PCS*
1.	Compliances with the following conditions while appo	ointing/re-appointing	ng an auditor
<u>.</u>	 i. 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 ii. If the auditor has resigned after 45 days from the end 	NA	There was no event of reappointment/resignation of Statutory Auditors of the Listed Entity during the review period. Appointment of Statutor
	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 iii. If the auditor has signed the limited review/ audit	NA	Auditors: The terms of appointment of previous Statutory
	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.	NA	Auditors of the Company M/s. A.K. Meharia & Associates, Chartered Accountants was complet in the 34th AGM held in tyear 2022.
			Subsequently, the Board and shareholders have approved the appointmer of new Statutory Auditor M/s. Alps & Co., as a Statutory Auditor of the Company for the term of consecutive years (Financial Year 2022-23 2026-27). They have issued and shareholders are supported by the statement of the subsequent
			the Limited Review/Aud Report for the relevant quarter during their tenu

2. Other	Other conditions relating to resignation of statutory auditor								
i.	Reporting of concerns by Auditor with respect to the listed entity/its material subsidiary to the Audit Committee: 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 the Chairman of the Audit Committee of the listed entity and the Audit Committee shall receive such concern directly and immediately without specifically waiting forthe quarterly Audit Committee meetings.	N.A.	There was no event of resignation of Statutory Auditors of the Listed Entity during the review period.						



Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations /Remarks by PCS*
	 b. In case the auditor proposes to resign, all concerns with respect to the proposed resignation, along with relevant documents has 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. 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. 		
	II. Disclaimer in case of non-receipt of information:		
	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.		
3.	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 18th October, 2019.		There was no event of resignation of Statutory Auditors of the Listed Entity during the review period.



								Observati		
	Compliance							ons/Rem	1	
	Requirement						Fine	arks of the	Manag	
Sr	(Regulations/	Regul		Acti	_	Details	Amount	Practicin	ement	Remarks
	circulars/guid	ation/	Deviati	o n	Type	of Viola	Amount	g	Respon	
N	elines	Circul	ons	Take	of	tion		Company	sc	
0.	including	ar No.		nby	Acti		-	Secretary		1 1
	specific		2		on			,		
	clause)								TT	The
_				Nationa	Donalty	As per	NSE- Rs.	The	The	company
1		Regulatio			Penanty		1-12000/	company has		has
1		n 17(1)	Regulation	1 Stock		Regulation 17(1) of the	(including	two (2) New	has submitted	appointed
1		of the	17(1) of the	ge of		SEBI	GST), for	Directors in	on various	two (2)
1		SEBI	CCDI	India		DEDI	the quarter	their Board	dated the	New
		(LODR),		Limited		(LODR),		1 1	waiver	Directors in
		2015.	120	& BSE			September	11.01.2022.	application	their Board
	1			Limited				Dataila of	for	dated
1	1		listed			listed	Rs. 542800/-	the	considerati	11.01.2022.
			entities			entities		appointed	on to	Details of
1			(with effect			(with effect	(including	directors.	waived the	the
			from April			from April	GST), for	Dagnanka	imposed	appointed
1					1	1, 2020)	the quarter	r Bose	penalty, to	directors.
	Regulation 17(1)		.,	1		shall	ended	(DIN-		5. Deepank ar Bose
			shall			comprise of	December,	09450920	Exchanges	(DIN-
- 1	D	1	comprise of			not less	2021	1)	and it is	0945092
	(LODR), 2015.		not less than	1		than six	1	4. Bishwanat	progress	0)
1	-The composition of board of	1	six			directors.	BSE- Rs.	h Choudhar		6. Bishwan
	directors of the		directors.			Accordingl	542800/-	mn!	resolved	ath
1	listed entity.		Accordingly	1 .			(including GST) for	y (DIN- 02313294	vet.	Choudha
1	(c) The board of		Number of	4		of the board	the quarter			ry (DIN-
1	directors of the		the board	1			ended	After the		0231329
	top 1000 listed		member was	1		was 5 i.e.	December.	said	72	4)
- 1	entities (with		5 i.e. less			less than six	2021.	appointment	19	After the
	effect from April		than six			less than six		currently the		said
	1, 2019) and the		since the			since the	1	board has 6		appointmen
	top 2000 listed		quarter			quarter		members.		t currently
	entities (with		ended			ended		Further		the board
	effect from April		September,			September,	1	the		has 6 members.
	1, 2020) shall		2021.			2021.		company		Further the
	comprise of not less than six		Accordingly		0.000	- ,51		has		company
	directors.	1 ,			1.77 2.70	1.5		submitted on various		has
	directors.		the					dated, the		submitted
			exchanges					waiver		on various
	1		have					applicatio		dated, the
			imposed					n for		waiver
			penalty vide					considerat		application
			issued letter					ion to		for
			By NSE- 1.					waived		consideration
			Letter No.					the		n to waived
			NSE/LIST-					imposed		the impose
			SOP/COMB					penalty, to		penalty, to
			FINES/082		10.			the		the
								exchanges		exchanges
		1-1	dated						•	-



NSE/LIST- SOP/COMB /FINES/082 5, dated November 22, 2021.		the imposed penalty, to the exchanges and it is still in progress	the exchanges and it is still in progress and not resolved yet.
2. Letter No. NSE/LIST- SOP/COMB /FINES/083 2 dated February 21, 2022.		and not resolved yet.	7
By BSE- 1. SOP- CReview- (21-Feb- 2022) Recd. Vide mail			
2022. 2.SOP- Reminder- December 2021 Recd. Vide mail dated 09-03- 2022.			

- (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 my examination of those records on sample basis.
- (c) The listed entity has taken the following actions to comply with the observations made in previous reports:



(a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelinesissued thereunder, except in respect of matters specified below:

								Observati	T	T
	Compliance							ons/Rem		
	Requirement							arks of the	Manag	
c-	(Regulations/	D 1		Acti		Details	Fine	Practicin	ement	Remarks
Sr		Regul	Deviati	o n	Type	of Viola	Amount	-	Respon	
: 1	circulars/guid	ation/	20		of	tion		g	se	1 1
N	clines	Circul	ons	Take	Acti			Company	SC	,
0.	including	ar No.		nby	on			Secretary		
	specific				"					
	clause)								The	The
				Nationa	Denalty	As per	NSE- Rs.	The		company
1		Regulatio		l Stock	Charty	Regulation	542800/-	company has	has	has
		n 17(1)	Regulation	- Stock		Regulation 17(1) of the	(including	appointed	mas	appointed
		of the	17(1) of the	Exchan		17(1) 01 110	GST), for	two (2) New	Submitted	two (2)
		SEBI	SEBI	P		SEBI		Directors II	KIII Vallous	New
				India		(LODK),	ended	their Board		Directors in
		(,	•	Limited & BSE	2-	2015 the	September	dated	Waiver	heir Board
	1 - 1	-010.				top 2000	2021 and	11.01.2022.	application	dated
1			· op	Limited	4	listed	Rs.	Details of		11.01.2022.
			listed			entities		the		Details of
			entities				V-	пррописс	on to	Details
1		}	(with effect			(with effect	(including	directors.	waived the	appointed
1	Regulation 17(1)		from April			from April	GST), for	 Deepanka 	imposed	appointed 1
	of the SEBI					1, 2020)	the quarter	r Bose		directors. 1. Deepankar
1	(LODR), 2015.		-,			shall	ended	(DIN-	the	Deepankar
	(LODK), 2013.		shall			comprise of	December,	09450920	Exchanges	Bose (DIN-
	The composition		comprise of	1		not less	2021)	und it is	09450920)
	of board of		not less than					2. Bishwanat	Desc	2.Bishwana
	directors of the		six				BSE-Rs.		progress	th
	listed entity.		directors.			directors.	542800/-	Choudhar		Choudhary
	(c) The board of		Accordingly			Accordingl	(including	y (DIN-		(DIN-
	directors of the		Number of			y Number	GST) for	02313294		02313294)
1	top 1000 listed			200		of the board)		After the
1	entities (with		the board			member	ended	After the		said
1	effect from April		member was			was 5 ie	December,	said		appointmen
	1, 2019) and the		5 i.e. less			less than six	2021. [appointment	1	t currently
	top 2000 listed		than six			less than six		currently the		the board
	entities (with		since the			since the		board has 6		has 6
	effect from April		quarter			quarter		members.		members.
	1, 2020) shall		ended			ended		Further	1	Further the
	comprise of not			- 1		September,		the	9 9 1	company
	less than six		September,	- 1		2021.		company		has
	directors.		2021.	- 1		2021.		has		submitted
			Accordingly					submitted		on various
		-	he	- 1				on various		dated, the
			exchanges					dated, the		waiver
		- 1						waiver		application
			ave					applicatio		for
			mposed					n for		consideratio
			enalty vide					considerat		n to waived
		li	ssued letter					ion to		the imposed
			By NSE- 1.					waived		penalty, to
			etter No.	-				Walveu		pointing, to
			retter 1104					11 11 11 11 11	HRUTI	

November 22, 2021. 2. Letter No. NSE/LIST- SOP/COMB /FINES/083 2 dated February 21, 2022.		and it is still in progress and not resolved yet.	and it is still in progress and not resolved yet.
By BSE- 1. SOP- CReview- (21-Feb- 2022) Recd. Vide mail dated 21-02- 2022. 2.SOP- Reminder- December 2021 Recd. Vide mail dated 09-03- 2022.		(HRU	TI AG TAILE AL

Place: Kolkata Date: 30.05.2023

Shruti Agarwal
Practicing Company Secretary

ACS No.: 38797 C P No.: 14602

UDIN: A038797E000421509

Peer Review No.: 3206/2023