



# WHITE ORGANIC AGRO LIMITED

312A, Kailas Plaza, VallabhBaug Lane, Ghatkopar (East), Mumbai - 400 077. INDIA  
Tel: +91.22.25011983 | Fax: +91.22.25011984 | Web: www.whiteorganicagro.com|  
Email: info@whiteorganicagro.com; CIN: L01100MH1990PLC055860

30<sup>th</sup> June, 2021

**To,**  
**Listing Department**  
**Bombay Stock Exchange Limited**  
Phiroze Jeejeebhoy Towers,  
Dalal Street,  
Mumbai - 400 001

Sir,

**SUB: Submission of Annual Secretarial Compliance Report for financial year ended 31<sup>st</sup> March, 2021**

**Scrip Code: 513713**

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended and SEBI Circular No. CIR/CFD/CMD1/27/2019, we are forwarding herewith the Annual Secretarial Compliance Report for the financial year 2020-21.

Kindly take the above on your record.

Thanking You,

Yours faithfully

**For White Organic Agro Limited**

RUPAL  
VASANT  
NARVEKAR

Digitally signed by  
RUPAL VASANT  
NARVEKAR  
Date: 2021.06.30  
23:22:35 +05'30'

**CS Rupal Narvekar**  
**Company Secretary & Compliance officer**

### Secretarial Compliance Report of White Organic Agro Limited

I Rachana Maru Furia, Company Secretary in full time practise have in pursuance of regulation 24A of SEBI (Listing Obligation & Disclosure Requirement) Regulations, 2015 examined:

- a. all the documents and records made available to us and explanation provided by **White Organic Agro Limited** ("the 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 31<sup>st</sup> March, 2021 ("herein after referred to as **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;
- b. Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **(Not applicable to the Company during the period under review)**
- 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 to the Company during the period under review).**
- e. Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not applicable to the Company during the period under review).**
- f. Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not applicable to the Company during the period under review).**
- g. Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **(Not applicable to the Company during the period under review).**
- h. Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i. Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- j. SEBI (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Act and dealing with the Reporting Company;
- k. Circulars/ guidelines issued thereunder

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.	<b>SEBI (LODR), Regulations 2015- Reg. 29 (1) &amp; (2)</b>	Aforesaid regulation provides for prior intimation of any events or information, specified in Reg 29(1) to be submitted to the exchange by the listed entity within timelines prescribed in regulation 29(2) read with COVID relaxations given.	The Company had issued the prior intimation for Board Meeting at a shorter notice than the time specified under regulation 29(2) and the exchange had levied fine in terms of Circular no. SEBI/HO/CFD/CMD/CIR/P/2020/12. As explained by the management, in wake of challenges faced for carrying out operations amidst the COVID restrictions, the company couldn't submit the said intimation in prescribed time.
2.	<b>Late submission of Corporate Governance Report for June 2020 – in terms of Regulation 27 of SEBI(LODR) Regulations, 2015</b>	Minor delay in submission of quarterly Corporate Governance Report for Quarter Ended June 30, 2020.	As explained by the management, the said delays were on account of some technical challenges faced while submitting the said report in XBRL mode with the exchange. Fines levied by the exchange were duly paid.
3.	<b>Delay in submission of Unaudited (consolidated) Financial Results of the Company for the quarter ended 30<sup>th</sup> June, 2020</b>	Delayed submission of consolidated unaudited financial statements for the quarter ended June 30, 2020.	As explained by the management, the person responsible for managing the said submission of financial results in pursuance of regulation 33 of SEBI (LODR) Regulations, 2015 was infected with COVID – 19 and in his absence; the above submission was erroneously missed out by the Company. Fines levied by the exchange were duly paid.

- 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.

- c. 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 letters, debarment etc.	Observations / Remarks of Practising Company Secretary, if any
NIL				

- d. This Compliance report being the initial one, reporting of actions by the listed entity to comply with the observations made in previous report does not arise during the review period.

Place : Mumbai  
Date : 30-06-2021



**Rachana Maru Furia**  
Company Secretary in Whole Time Practice  
ACS No. 41825  
CP No. 16210  
UDIN: A041825C000559573