



Since 1907

Jost's Engineering Company Limited

C-7, Wagle Industrial Estate, Road No. 12, Thane 400 604, Maharashtra, India
CIN : L28100MH1907PLC000252 , Tel. : +91 22 61174000, 25821727/46, Fax : +91 22 25823478
Email : jostfact@josts.in Website: www.josts.com
(Registered Office : Great Social Building, 60 Sir Phirozeshah Mehta Road, Mumbai 400 001)

To,
The Secretary,
BSE Ltd.,
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai- 400001
June 12, 2020

28th May, 2022

Dear Sir,

Scrip Code- 505750

Sub: Annual Secretarial Compliance Report for the Financial Year ended March 31, 2022
Ref: SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019.

In compliance with the aforementioned SEBI Circular, please find attached the Annual Secretarial Compliance Report for the Financial Year ended March 31, 2022, issued by M/s Akshay Gupta & Company.

Please take the above disclosure on record.

Thanking you,

Yours Faithfully,

For Jost's Engineering Company Limited

Rohit Jain
Chief Financial Officer &
Addl. Compliance Officer



Encl: As above



SECRETARIAL COMPLIANCE REPORT OF JOSTS ENGINEERING COMPANY LIMITED
FOR THE YEAR ENDED 31ST MARCH, 2022

I, Akshay Gupta, Company Secretary in whole time Practice have examined:

- a. all the documents and records made available to us and explanation provided by the Josts Engineering Company 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 31st March, 2022 ("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;
- 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 company during the review period**)
- e. Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (**Not applicable to company during the review period**)
- f. Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (**Not applicable to company during the review period**)





- g. Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **(Not applicable to company during the review period)**
- h. Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i. and circulars/ guidelines issued thereunder;

And based on the above examination, I/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, 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.	Pursuant to Regulation 6 - (1) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	The Company Secretary has resigned from the company as on 07/02/2022 which was accepted by the company with effect from 11/02/2022.	The Company has given explanation that it has six months to appoint Qualified Company Secretary/ Compliance officer for Compliance under Regulation 6(1) of SEBI (Listing Obligation and Disclosure Requirement) Regulations, 2015 after the resignation of previous Company Secretary who ceased in the employment of the Company w.e.f. 11 th February, 2022. The Company will put in its best efforts to fill in the vacancy by appointing a suitable candidate, as early as possible. Mr. Rohit Jain (CFO) is an additional



			compliance officer of the company.
2.	Regulation 30 read with schedule III of the Part A (4) of SEBI (Listing Obligations and Disclosures Requirement) Regulation, 2015- The listed entity shall disclose the outcome of the board meeting within 30 minutes of the closure of the meeting of the Board of Directors.	There was a delay of 5 hours 10 minutes on BSE in submitting the outcome of the meeting of the Board of Directors	The outcome of the meeting of the Board of Directors held on May 6 th , 2021 were submitted with a delay of 5 hours 10 minutes on BSE.

Note: As informed by the Management of the Company, due to COVID-19 pandemic, the meetings of the Audit Committee and Board were held through video conference. Due to logistics of digital signatures and technical issues, there was a delay in signatures and uploading process which led to delay in uploading the outcome of Board meeting held on May 6, 2021, with respect to disclosure and intimation pursuant to Regulation 33,42 and 30 of SEBI (LODR), Regulation, 2015 on Stock Exchange(s) beyond 30 minutes as required under Regulation 30 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015. There was no query from the stock exchanges.

- B. The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from our examination of those records.
- C. There were no 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.
- 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 31 st March, 2021	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	Company has not appointed the qualified Company Secretary as the Compliance Officer for the period 01.03.2020 to 22.11.2020	<p>1. Company has paid a fine of Rs. 35400/- due to the Non-Compliance of Regulation 6 (1) of SEBI (LODR) during quarter ended September 2020.</p> <p>2. Company was levied a fine of Rs. 62000/- due to the Non-Compliance of Regulation 6(1) during quarter ended December 2020. However, Company has made representation to Stock Exchange that due to nationwide lockdown due to COVID-19 pandemic since March 2020 Company was unable to find suitable candidate and have requested for Waiver of the fine and Hence, Fine is not paid.</p> <p>However, A Company Secretary and Compliance officer was appointed w.e.f. 23rd November, 2020.</p>	The Company has appointed a Company Secretary and a Compliance officer w.e.f. 23 rd November, 2020 and has complied with the Provisions of regulation 6(1) of SEBI (LODR).
2.	Company has not submitted the Annual report within the period prescribed under this regulation.	There was a delay of 3 days in submission of Annual Report to BSE for which a fine of Rs. 7080/- was paid to Stock Exchange.	Fine of Rs. 7080 was paid to the Stock Exchange.





AKSHAY GUPTA & CO.
COMPANY SECRETARIES

3.	Company has not placed before the Board the fines levied by the stock exchange.	The said fines reflected in Company's accounts as approved by the Board of Directors in its meeting held on 6 th May, 2021.	The said fines were tabled in the meeting of Board of directors dated 7 th August, 2021.
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Date : 27.05.2022
Place : Kota

For Akshay Gupta & Company
Company Secretaries



CS Akshay Gupta
Proprietor
M.No.: 56911
COP No.: 21448
PR No.: 1872/2022
UDIN:A056911D000412629