

VIDHYA BAID & CO

Company Secretaries

Secretarial Compliance Report of THE ORISSA MINERALS DEVELOPMENT COMPANY LIMITED for the financial year ended 31st March 2023

To, THE ORISSA MINERALS DEVELOPMENT COMPANY LIMITED

CIN: L51430OR1918GOI034390

Registered Office: C/O. SAIL OFFICE, GROUND FLOOR. PLOT-271 BIDYUT MARG, UNIT-IV, SHASTRI NAGAR. BHUBANESWAR KHORDHA ORISSA 751001

We, Vidhya Baid & Co. Company Secretaries, Kolkata have examined:

all the documents and records made available to us and explanation provided by THE ORISSA MINERALS DEVELOPMENT COMPANY LIMITED ("the listed entity").

- (a) the filings/ submissions made by the listed entity to the stock exchanges.
- (b) website of the listed entity,
- (c) any other document/ filing, as may be relevant, which has been relied upon to make this certification.

for the year ended 31^{lpha} 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, 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.
- (e) 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.
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

Registered Address: 35. Armenian Street, 3rd Floor, Kolkata 730 001 Tel: 033 4066 0171 (M) +9: 9007450898, +0: 9830705261

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We hereby report that, during the Review Period the compliance status of the listed entity is appended as below

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	and the second s	and the same	
Des Francis		Total Control	
1.	Secretarial Standards:		
	SCOTTON TO AND THE STRANDSON	1	Though there
	The compliances of the listed entity are in		exists systems to
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	Standards (SS) issued by the institute of Company	Ì	
	Secretaries India (ICSI), as notified by the Central Government under section 118(10) of the		
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	and mandatonly applicable		
	<u> </u>		The second secon
2.	Adoption and timely updation of the Policies:	1	Same.
	are adopted with the approval of board of directors	Yes	
	of thelisted entities		
	All the policies are in conformity with SEBI		
	Regulations and have been reviewed & updated	No	Delay in updation of
	On time		
	regulations/circulars/guidelines issued by SEBI		Observed
3.	Maintenance and disclosures on Website:		
ė.		Yes	The Company has
	2.	- ***	functional website
	Timely dissemination of the documents/ Information and decoments/	Though there exists systems to monitor and ensure compliance with the applicable Secretarial do by the Institute of Company CSI), as notified by the Central section 118(10) of the and mandatorily applicable. Secretarial Standards yet there lies scope to strengthen the same. Sequence of the Policies: Cies under SEBI Regulations approval of board of directors Fire in conformity with SEBI we been reviewed & updated as per the significant per compliance with the applicable. Secretarial Standards yet there lies scope to strengthen the same. Yes Delay in updation of policies have been observed The Company has maintained fully functional website at https://www.aseparate section on the birdgroup.co.in/omd c/* but there is delay in timely dissemination of the documents/ under Regulation 27(2) are fite which re- directs to the	
Î	information under a separate section on the website	. 140	c/* but there is
	5 CO		delay in timely
1	- ourpoidte	No	
	governance reports under Regulation 27(2) are		
	accurate and specific which re- directs to the		separate section on
	relevant document(s)/section of the website		
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4.	Disqualification of Director: None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	Yes	
5.	Details related to Subsidiaries of listed entitles have been examined w.r.t.: (a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries	Yes .	
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	
7.	Performance Evaluation: The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committeesat the start of every financial year/during the financial year as prescribed in SEBI Regulations.	No	Since the Company does not have the sufficient number of Independent Director, the has not been complied with.
8.	Related Party Transactions: (a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or (b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.	Yes	
9.	Disclosure of events or information: 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		Refer Annexure A attached herewith
10.	Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	No A BAIO	Not complied during the reporting period

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11	Actions taken by SEBI or Stock Exchange(s), if any:	Yes	Refer Annexure A
-	No action(s) has been taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBIor by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder except as provided underseparate paragraph herein (**).		
12.	Additional Non-compliances, if any: Additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	Yes	Refer Annexure A attached herewith

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

	Paragraph 1	Compliance Status (Yas/No/ NA)	Section (All place) Remarks by Compared to
1.	Compilances with the following conditions while appoint	ointing/re-appointing	g an auditor
	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 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	NA	The auditor of the Company has not resigned during the period under review.
	the next quarter; or III. If the auditor has signed the limited review/ audit 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.		
2.	Other conditions relating to resignation of statutory au	uditor	



	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 asserts.	NA.	The auditor of the Company has not resigned during the period under review
	shall receive such concern directly and immediately without specifically waiting for the quarterly Audit Committee meetings.		
	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		
3.	information as required by the auditor. 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.	NA	The auditor of the Company has not resigned during the year under review

^{*}Observations /Remarks by PCS are mandatory if the Compliance status is provided as 'No' or 'NA'



(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/ guide- lines including	Regu- lation/ Circular No.	Deviations	Action Taken by	Type of Action (Advisory/ Clarificatio n/ Fine/Sho w Cause Notice/ Warning, etc.)		Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Man- age- ment Re- sponse	Re- marks
	specific clause)	22				и				
	•				Refer Annexure A					

(b) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	Compliance Requirement (Regulations/ circulars/ guide- lines Including specific clause)	Regu- lation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observational Remarks of the Practicing Company Secretary	Man- age- ment Re- sponse	Re mar ks
				,	Refer Annexur	* A				

Place: Kolkata

Date: 29th May, 2023 UDIN: F008882E000406576

For VIDHYA BAID & CO. **Company Secretaries**

(Proprietor)

FCS No. 8882 CP No. 8686

PR NO. 649/2020



VIDHYA BAID & CO

Company Secretaries

To,
THE ORISSA MINERALS DEVELOPMENT
COMPANY LIMITED

CIN: L51430OR1918GOI034390

Registered Office: C/O, SAIL OFFICE, GROUND FLOOR, PLOT-271 BIDYUT MARG. UNIT-IV, SHASTRI NAGAR

BHUBANESWAR KHORDHA ORISSA 751001

Our report of even date is to be read along with this letter.

- 1. It is the responsibility of the management of the Company to maintain records, devise proper systems to ensure compliance with provisions of all applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and to ensure that the systems are adequate and are operating effectively.
- 2. Our responsibility is to verify compliances by the Company with provisions of all applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and issue a report thereon.
- 3. Wherever required, we have obtained the Management representation about the compliance of laws, rules and regulations and happening of events etc
- 4. The Annual Secretarial Compliance report is neither an assurance as to the future viability of the Company nor of the efficacy or effectiveness with which the management has conducted the affairs of the Company.
- 5. We have not verified the correctness and appropriateness of financial records and books of accounts of the Company as well as correctness of the values and figures reported in various disclosures and returns as required to be submitted by the Company under the specified laws, though we have relied to a certain extent on the information furnished in such returns.

Place: Kolkata

Date: 29th May, 2023

For VIDHYA BAID & CO. Company Secretaries

VIDHYA BAID (Proprietor) FCS No. 8882 CP No. 8686

PR NO. 649/2020

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The listed snifty has compiled with the provisions of the above Regulations and circulars' guidelines issued thereunder, except in respect of matters specified below. <u>a</u>

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Man-age-ment Rasponse	Nanagement, since SST record as no been updated with the Depositories, linvestor Grievance Redressa Report coulo not be generated by them which led to delay in submissions of Reports with the Exchange. The alonesaid reason for delay was intimated to NSE for their consideration and applied for waiver of expension and expens
Obser-vations Remarks of the Practicing Company Secretary	There was delay of sa per 3 months (approx/Management) in submission of SST record the Report could generated before submissions (with the Exchangement) adoresaid redelay was into NSE for consideration applied for applied for a
FineAmount	
Details of Molation	Delay in submission of fivestor Charlestor of fivestor Charlestor of fivestor quarter ended 30th June 2022.
Typeof Action (Advisory/Clarification/ Fine/Show Cause Notice/ Warning, etc.)	
Action Taken	
Dervietors	Delay in submission of Statement of Investor Compleants for the quarter ended 30thJune 2022.
Regulation Circular No.	Regulation 13(3)
Com- plianceRequire- ment(Regu- lationalchrularuig uide- limatinchudingspec ificciause)	Regulation 13(3) Of SEBI LODR Regulations, 2015
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the delay penalty to NSE some is penalty, to NSE some is penalty. The son for maled to their art	No disclosure made during the reporting period		e e
per regement, s due to trucal issue system resaid. rea ay was infine E for sideration water wed.	ine.	As per the Management frest since GST record as not been updated with the Depositories. Shareholding Pattern Report could not be penerated by them with the Exchange. The aforesaid reason or delay was intimated or delay was intimated.	to NSE for their consideration and applied for walver of
There was delay of As days in Ma Submission of thewas Report. Broad afformation of the Machanian and a days of the	Penalty was pare by the Company	There was delay of a months (approx) in submission of the Report	80 m
Penalty of Rs. 9440-including GST was imposed	of Penalty of Rs Penalty was party 11800' including by the Company year mitter		
•	No disclosure of Penalty of Rs. Related Party 1180/2 including Transactions has been GST was imposed made for the year ended 30th September 2022	Delay in submission of Shareholding Pattern for the quarter ended 30th June 2022	
Fine o	Fine		
NSE	NSE		
Delay in submission of Corporate Governance Report for the quanter ended 30th June 2022.	No disclosure of Related Party Transactions has been made for the year ericed 30th September 2022	Regulation Regulation 31(1)(b) Delay in submission of of SEBI Shareholding Pattern for isgulations the quarter ended 30th June 2022	
Regulation 27(2)	Regulation 23 (9)	Regulation 31(1)(b)	Alter-
Regulation 27(2) Of SEBI LODR Regulations, 2015	Under Negulation 23 (9) (9) of SEB LODR Regulations 2015	Under Regulations 31(1)(b) of SEB LOOR Regulations 2015	
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Population (2014) Provided Primarkal International Property (2014) Provided Primarkal Primark				
Pagulatore, 2015 Pagulatore,		per ent that say out as a say out as a say out as a say out a say	uditor was appointed y the C&AG	Due to the critical financial position of the company, the same are not compiled for this period. However, the company took steps to comply with the same and has compiled since
Pegudeicra, 2015 Regulation (2011) Non submission of Central procession of Central proce	days days ally was he Compan	<u> </u>	There was delay of A	19
Decided of the second of the	Penalty of Rs. 82,6004- Including GST was imposed.	• _		,
Pagulators, 2015 Pagulators, 2015 Under Regulator/Regulation 7(3) Non submission of 7(3)vd SEB LOOR Completes Certificial Ended State Auto 2022 Thylind SEB LOOR Completes Certificial Ended State Auto-2022 Thylind SEB LOOR Completes Certificial Ender the half provided 3 decoration maintaining physical 3 decoration maintaining provided 30 decoration Septimentor 2022 Under Regulation 47 Regulation 6 Regulation 10 Reg	Presults for the quarter andled 30th June 2022.	britission Certifica maintainia & electron facilityfor the ended30 or 2022	in submi	The fisted entity has no published the information specified in the Regulation in newspaper nw.r.t. publication of Uhaudited Financia Results for the quarter feeting.
Pagulations, 2015 Results for the quantum product 30th June 2022 Under Regulation Regulation 7(3) Non submission of 7(3) of SEBI LDDR Compliance Certification maintaining physical 3, electronic transfer facility for the full production of 20th September 2022 Under Regulation Regulation 33(3)(d) Delay in submission of 23(3)(d) of SEBI CORR Regulations. Under Regulation 47Regulation 47 The Island entity has not of SEBI LDDR Regulation of the information specified in fine Regulation, 2015 Under Regulation 47Regulation 47 The Islands the information specified in fine Regulation of Unauditied Financial Regulation of Unauditied Financial Results for the quantum ended 30th June quarter ended 30th June	e E			(SA)
Notes Regulations, 2015 Besults for ended 30th Mon submit 7(3) of SEBI LOOR Compilance Compilance Results from 2015 Compilance Regulations, 2015 Under Regulations (SEBI LOOR Septiember 20 September 20 September 20 September 20 September 20 September 33(3)(d) of SEBI LOOR Regulations, 2015 Under Regulation 47 Regulation 47 Regulation 47 Regulation 47 Regulation of SEBI LOOR Regulation 47 Regulation of Financial Results on Compilance and Compilance of SEBI LOOR Regulation 6 SEBI LOOR Regulation 6 SEBI LOOR Regulation 6 SEBI LOOR Regulation 6 SEBI LOOR Regulation 7 The listed entited of Financial Results of SEBI LOOR Regulation 6 SEBI LOOR Regulation 6 SEBI LOOR Regulation 6 SEBI LOOR Regulation 7 The listed entited of Financial Results of SEBI LOOR Regulation 6 SEBI LOOR Regulation 6 SEBI LOOR Regulation 7 The listed entited of Financial Results of SEBI LOOR Regulation 6 SEBI LOOR Regulation 7 The listed entited of Financial Results of SEBI LOOR Regulation 6 SEBI LOOR Regulation 7 The listed entited of Financial Regulation 7 The Instead entited of Financial Regulation 7 The Instead entited of Financial Regulation 6 SEBI LOOR Regulation 7 The Instead entited of Financial Regulation 7 The Instead entited of Financial Regulation 7 The Instead entited of Financial Regulation 7 The Instead entitle 6 The SEBI LOOR Regulation 7 The Instead entitle 6 The SEBI LOOR Regulation 7 The Instead entitle 6 The SEBI LOOR Regulation 7 The Instead entitle 7 The SEBI LOOR Regulation 7 The Instead entitle 7 The	<u> </u>			
Pegulations, 2015 Under Regulation 7(3)of SEBI LODR Recylations, 2015 Recylations, 2015 Under Regulation 47 of SEBI LODR Regulation 47 of SEBI LODR Regulations, 2015	Unaudited Financial Results for the quarter ended 30th June 2022	Non submission of Compliance Certificate certifying maintaining physical & electronic transfer facilityfor the half year ended 30th September 2022	Pelay in submission of lecteration and under tegulation 33(3)(d) of he SEBi (LODR) tegulations, 2015	published the information specified in the Regulation in the regulation of Unaudited Financial Results for the quarter ended 30th June 2022, 30th Sectlember
Pegulations, 2015 Under Regulation 7(3)of SEBI LODR Recylations, 2015 Recylations, 2015 Under Regulation 47 of SEBI LODR Regulation 47 of SEBI LODR Regulations, 2015	,	Regulation 7(3)	Regulation 33(3)(d)	
	Of SEBI LOOR Regulations, 2015	Regulations SEBI LODR Flores, 2015	Regulation of SEB Regulations,	of SEBI LODR Regulations, 2015
		vò.	· s	

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			As per free Management, corrective measures have been for Closure of Trading window for declaration of Financial Results for the quarter ended 31st December 2022 conwards.
	prior Penalty of Rs. There was delay of Board 11,8004-including11 day and Penalty for CST was imposed was paid by the company. Company.	No disclosure made during the reporting period	Delay in intimation
	and 1,800's imposed for the second sec	ŀ	
30th September 2022 and w.f.t to convening of Annual General Meeting hald quing the period under review	Delay of 1 day in prior Internations of Board Meeting held for Adoption of Unaudited Financial Results for the quarter ended 30th June 2022	Quarterly Disclosure under the said Regulation has not been made	Delay in intimation of Cosure of Trading window for declaration of Financial Results.
٨	Fine		
	ASE.	,	
2022 and w.r.t to convening of Annual General Meeting hald during the penod under review.	Delay of 1 day in prior infimations of Board Meeting held for Adoption of Unaudited Financial Results for the quarter ended 30th June 2002.	74(4)Quarterly Disclosume under the said Regulation has not been made	Delay in intimation of Closure of Trading window for declaration of Financial Results for the quarter ended 30th June 2022 and 30th September 2022
	Regulation 29 (2)	n 74(4)	Prohibilion of Trading) tions, 2015
	Under Regulation 29 Regulation 29 (2) (2) of SEBI LODR Regulations, 2015	Under Regulation Regulation 74(5) 74(4) and 74(5) of the and 74(5) SEB (Depositiones and Participants) Regulations	Under SEBISEBI ((Prohibition of InsiderInsider Trading) Regulations, Regula 2015
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				. 111		12	The Company has not	complied under	Pogration 31(4) Howe	complied the same	under regulation 31(1)	22.	
Delay in intimation		Delay in inforation	•			12	No disclosure	made during the	powed bulbodar				
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Change in Key Managen or Key Manageria Persons which was to be given within twenty four hours from the occurrence of event or information.		Delay in Intimation	Supreme Court that the Company is permitted to	Stock Beltundi Iron and	With Milnes ar		to declaration under	Securities and second	Board	ndia Substantial Assertions	Judgetting Acquisition	akeover)Regulations.	2011 has been given for
				<u>18.50</u>	2 .00	3	2 0	2 33	<u> </u>	<u> </u>	2 5		8
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Key		inerial control	2 D	A DUR L	В О	, land		ange	ceitos	and	 -	۳ و	69
Change in Key Managertal Parson	in velocity	LOC-Tegrating Order	about Company is permitted to	offying in Belkundi Iron and	Bagiabun: Iron	Mines No declaration	Regulation 31(4) of the	Securifies and Exchange	Substantial Amusican	Shares	Takeover)Regulations,	FY: 22-23	}
	- 1	Bi LOC-3	of SERIES		ons 2015	7		32 G	n 9		<u>F</u> à	ą II.	
Regulations 2015	Under Regulati⊴n 51Regulation 51	of SEBI LODRISEBI	read with Regulationread with RegulationCompany is permitted to 8 of SEBI (Prohibition) of Schools is in the company	of Insider Trading Prohibition Regulations 2015 Insider		Regulation 31(4) of Regulation 31(4)	the Securities and	Exchange Board of	Substantial	Acquisition of Shares	anulaceover) Reculations 2011		
5 Å	Pig	200	0 6	हैं केट	•	8	<u>ء</u>	2 5	35	8	Reou	,	



As per the Management shock GST record has not been updated with the Depositories. Shareholding Pattern Report could not be generated by them which led to delay in submissions of Reports with the Exchange. The altoresaid reason for delay was intimated to NSE for their consideration and applied for waiver of fine.	compared Minimus Saniface of No. Was a single of the control of th	2023 and updated all
,	on Penatry of Across Rs.23.49.380 /- Across Rs.23.49.380 /- Across Rs.23.49.380 /- Across Imposed and Penatry of Rs.11.94,180 /- Across Imposed and Across Imposed Across I	
Delay in submission of Reconciliation of share capital audit reportion the quarter ended 30th June 2022	Non appointment or independent Directors in the Board of Directors. Audit Committee and Normation and Remuneration Committee. The said requires Structured Digital Database (SDD)to be maintained by the Company but the Company but the Company has	2
	Fine	1
• ₁	NSE	
Delay in submission of Reconciliation of share capital audit reportor the quarter ended 30th June 2022.	Same Same Same Same Same Same Same Same	me said software on
SEB SEBURGO SOA	ntionRegulation (2), 17, 18, 19, 20(2), 21(2) 3ndRegulation 3(5) and 4T) 3(6)	
Copository Participant) Regulations	Under Regulation 17,18,19,20(2),21,21,25 of SEBI LC Regulations 2015 (6) 2(6) of SEBI (F Regulations, 2015	
	11.6	

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	2023. Hence delay in	intiblementation of SOC software has been	observed till the date of purchase of Software	
Merch 2023. Hence	DGBy in implementation of SOD software has	Deen observed till fre	Software	
			P. The Communication	

Note: 1. The Company status is in Suspended Category as per Calcutta Stock Exchange Website since last few years for various non compliances. Earlier, the Company was complying with its reporting compliances through email. Recently its oratine "compliance uploader connect" id has been generated for updating compliance.

Remark	Payment of peralty to NSE is pending
Manage ment Re sponse	The company has initialed to take company has initialed to take comedive measuries to the same. The afonesaid reason for delay was intimated to NSE for their consideration and appliedfor waiver of
Othervations/Remarks of the Practicing of the Pr	tice dated Since the Directors are appointed by the Ministry, the matter was red for laten up with the ser Ended Ministry of Steel and riber 2021, Beveral request have lies amount in Directors on the Board. The Schncluding waive the penalty as an andividuo the Directors were not appointed by Ministry of appointed and appointed by Ministry of appointed by Ministry of appointed and appointed by Ministry of appointed by Ministry of appointed and appointed by Ministry of appointed and appointed by Ministry of appointed and appoint
FineAmount	Notice dated S2.11.202 received for a Quarter Ended September 2021, printposing at penaltiessamcuntin Pry 9 to Rs. C. 5.771,120including was GST. andfredtoe the dated 21.02.2022 app
Details officiation	Non appointment of Independent Directors in the Board of Directors, Audit Committee and Nomination and it Remuneration Committee.
Typeof Action	Fine 4.N BAIO
Action Taken By	NSE .
St. Com- Regulation/Circu Deviations Action Taken Typeof By Action Hinesincludingspec Hickause)	Non appointment of independent Directors in the Board of Directors, Audit Committee and Nomination and Remuneration Committee.
Regulation/Circu	Regulation 17,18,19,20(2),21 In (2), 25, 27(2)
Com- plianceRequire- ment(Regu- lations/circularsgu- ide- linesincludingspec iffectause)	Under Regulation 17,18,19,20(2),21(2 1 1,25,27(2) of SEBI LOOR Regulations, 2015
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	Payment of penalty to NSE is pending	Payment of panalty to NSE is pending
	As per the Management that since GST record as not been updated with the Depositories, by them which led to delay in submissions of Reports with the Exchange.	As per the Management that since GST record as not been updated with the Depositories, by them which led to delay in submissions of Reports with the Exchange
Bult on the part of the Company. Moreover as per the Management. 3 Independent Directors has been appointed since November 2021. Payment of penalties are pending.		
received for Ouerter Ended December 2021, imposing penatities amounting to Rs. 15,45,800(including rg GST).		Notice dated 16.05.2022 received for Quarter Ended March 2022, imposing penalties amounting to Rs. 88,500 including GST.
•	Compliance Certificate for the quarter ended 31st March 2022 has not been submitted	Statement of Investor Complaints for the quarter ended 31st March 2022 has not been submitted
		Fine
		NSE
	Compliance Certificate for the quarter ended 31st March 2022 has not been submitted	Statement of Investor Complaints for the quarter ended 31st March 2022 has not been submitted and Shareholding Pattern for the quarter ended 31st March 2022 has not been submitted.
,	Regulation 7(3)	Regulation 13(3) and Regulation 31(1)
	Under Regulation 7(3)of SEBI LOOR Regulations 2015	Under Regulation 13(3) of SEBI LODR Regulations, 2015and Under Regulation 31(1)(b) of SEBI LODR Regulations 2015
	2	e.



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		Payment of penalty to NSE is pending	
Complied by the	,	Company	
	,	Delay in Reporting	
70		Penalty has been imposed by NSE, please share amount	
Delay in infimation of Closure of Trading window to declaration of Financial Results	Payment of Listing Fees for the year ended 31st March 2022	Delay in submission of Corporate Governance Report for the quarter ended 31st March 2022.	
1		Fine	-
		35 X	
Delay in Intimation of Closure of Tracing Window for declaration of Financial Results	Payment of Usting Fees for the year ended 31st	Delay in submission of Corporate Governance Report for the quarter ended 31st March 2022	
3 7 4 7	Regulation 14	Regulation 27(2)	
Under SEBI (Prchibition of Insider Trading) Regulations, 2015	Under Regulation 14 of SEBI LOCR Regulations 2015	Under Regulation 27(2) of SEBI LODR Regulations 2015	
*	7	ω	



	Payment f penalt; o NSE is ending	T
	Paymen of penalty to NSE is pending	
The aforesaid reason for delay was intimated to NSE for their consideration and noted for future compliance	As per the Management that since GST record as not been updated with the Depositories: by them which led to delay in submissions of Reports with the Exchange	
Delay in Raporting.	Delay in Reporting.	
Notice dated 14.01.2022 received for Ouarter Ended September 2021, imposing penaltites amounting to Rs. 188800 (including GST).	Notice dated 29 06 2022 received for the year Ended March 2022, imposing penalties amounting to Rs. 70,800 (including	
Delay in disclosure of Retated Party Transactions for the year ended 31 st March 2022	Delay in Reporting.	No disclosure made during the reporting period.
8	Fire	
SS.	NSE	
Related Party Transactions for the year swized 31st March 2022	Delay in submission of AnnualSecretarial Compliance Report of for the year ended 31st March, 2021 and 31st March, 2022	Intimation for change in Directors and Key Managerial Persons to be given within twenty four fours from the occurrence of event or information
23 (9) Transact anxiet anxiet 3	Regulation 24A	Regulation 30
23 (9) of SEBI LOOR Regutations 2015	Under Regulation 24A of SEBI LODR Regulations 2015	Under Regulation 30 of SEBI LOOR Regulations 2015
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	As per the Management that since CST record as nix been updated with the Depositories, by them which led to delay in submissions of Reports with the Exchange	The company took steps to comply with the same and has complied since December 2022
Detay in Reporting.	Corrective measures been undertaken	Corrective measures been undertaken
	•	·
Delay in submission of Annual Report for the year ended 31st March 2021	Delay in submission of Reconditation Of Share Capital Audit Report for the quarter ended 30th September 2021 and no reporting were made for the quarter ended 31st December 2021 and 31stMarch 2022	No disclosure made during the reporting period under the said Regulation
ē		
		•
Regulation 34(1) Delay in submission of Amrual Report for the year anded 31st March 2021	Delay in submission of Reconcilisation Of Share Capital Audit Report for the quantar ended 30th September 2021 and reporting were made for the quantar ended 31st December 2021 and 31stMarch 2022	published the information specified in the Ragulation in newspaper simultaneously with the submission of the same to the stock exchange(s)
Regulation 34(1)	-	Regulation 47
Under Regulation 34(1) of SEBI LODR Regulations 2015	Under Regulation 5:5A of SEB! LOOR Regulations 2015	Under Regulation 47 of SEBI LODR Regulations 2015
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Corrective measures been undertaken	· ·
Correction	
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Delay in Reporting	No disclosure made during the reporting period.
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Delay in submission of Compliance cerfficate for the year ended 31st March 2022	y Disclo
Delay in submission Compliance certific for the year ended 31st March 2022	Quarterty Disclosura under the said Regulation has not been made.
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40(9)	(5)
Regulation 40(9)	Regulation 74(4) and 74(5)
Under Regulation 40(9)of SEBI LODR Regulations 2015	Under Regulation 74(4) or the SEB! (Depositories and Participants) Regulations 2015
Under 40(9)or Reguti	Under 74(4) a Bre (Depos Parti Regular
<u> </u>	7

(c) The listed entity has taken the following actions to comply with the observations made in previous reports: (prior FY: 21-22)

uric- tartio. y araigu grapec	- Log	Reculation/Circu	Deviations	AntionTakanh	,					
berto.					ypeot	Details of Violation	FineAmount	Cheerysticns/Rem	Management Constitution of the Constitution of	ė
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	Non -payment of fees Due to critical financial position, the company delayed paying the tisting fees for FY 20.18-19.
No declosure made during the reporting penod	Non -payment of fees
,	
Quarterly Disclosure under the said Regulation has not been made •	Listing fees for FY 2018-19 has not been pead for Calculta Stock Exchange Limited
74(4) Quarterly Disclosure under the said Regulation has not been made	Listing fees for FY 2018- 19 has not been paid for Calcutta Stock Exchange Limited
14(4)	
Under Regulation Regulation 74(5) of the and 74(5) of the and 74(5) SEB (Depositories and Perfurpents) Regulations 2015	Regulation 14 SEBI Regulation 14 LOOR Regulations 2015
4.44	2

Note The Company is in receipt of vancus notices involving huge penatives w.r.t. violations under SEBI Regulations. Payment of penatry to NSE is pending for many instances since last few years

