



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 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, 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

and circulars/ guidelines issued thereunder.

Registered Address: 35, Armenian Street, 3rd Floor, Kolkata - 700 001

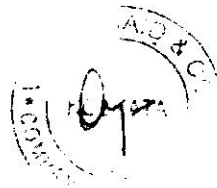
Tel: 033-4066 0171 (M) +91 9007450898, +91 9830205261

Mail: vbaid@vbaid.com, vbaid@vbaid.in, vbaid@vbaid.co.in



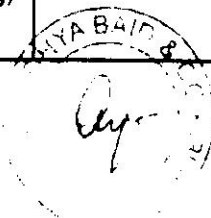
We hereby report that, during the Review Period the compliance status of the listed entity is appended as below

		Compliance Status	Remarks
1.	<p>Secretarial Standards:</p> <p>The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.</p>	No	Though there exists systems to monitor and ensure compliance with the applicable Secretarial Standards yet there lies scope to strengthen the same.
2.	<p>Adoption and timely updation of the Policies:</p> <ul style="list-style-type: 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 have been reviewed & updated on time, as per the regulations/circulars/guidelines issued by SEBI 	Yes No	Delay in updation of policies have been observed
3.	<p>Maintenance and disclosures on Website:</p> <ul style="list-style-type: 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 	Yes No No	The Company has maintained fully functional website at https://www.birdgroup.co.in/omd/c/ but there is delay in timely dissemination of the documents/information under a separate section on the website. Some of the web-links have not provided in annual corporate governance reports under Regulation 27(2).



A.D. & Co.
Chartered Accountants

4.	<p>Disqualification of Director:</p> <p>None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.</p>	Yes	
5.	<p>Details related to Subsidiaries of listed entities have been examined w.r.t.:</p> <p>(a) Identification of material subsidiary companies</p> <p>(b) Disclosure requirement of material as well as other subsidiaries</p>	Yes	
6.	<p>Preservation of Documents:</p> <p>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.</p>	Yes	
7.	<p>Performance Evaluation:</p> <p>The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.</p>	No	Since the Company does not have the sufficient number of Independent Director, the has not been complied with.
8.	<p>Related Party Transactions:</p> <p>(a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or</p> <p>(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.</p>	Yes	
9.	<p>Disclosure of events or information:</p> <p>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</p>	No	Refer Annexure A attached herewith
10.	<p>Prohibition of Insider Trading:</p> <p>The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.</p>	No	Not complied during the reporting period



11	<p>Actions taken by SEBI or Stock Exchange(s), if any:</p> <p>No action(s) has been taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or 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 under separate paragraph herein (**).</p>	Yes	Refer Annexure A attached herewith
12.	<p>Additional Non-compliances, if any:</p> <p>Additional non-compliance observed for any SEBI regulation/circular/guidance note etc.</p>	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.

	Particulars	Compliance Status (Yes/No/NA)	Observations/Remarks by PCS
1.	Compliances with the following conditions while appointing/re-appointing an auditor		
	<p>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</p> <p>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 the next quarter, or</p> <p>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.</p>	NA	The auditor of the Company has not resigned during the period under review.
2.	Other conditions relating to resignation of statutory auditor		

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	<p>i. Reporting of concerns by Auditor with respect to the listed entity/its material subsidiary to the Audit Committee:</p> <p>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 for the quarterly Audit Committee meetings.</p>	NA	The auditor of the Company has not resigned during the period under review
	<p>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.</p> <p>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.</p> <p>ii. Disclaimer in case of non-receipt of information:</p> <p>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.</p>		
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 18 th 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'

Signature

(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:

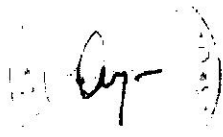
Sr. No.	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action (Advisory/ Clarification/ Fine/Show Cause Notice/ Warning, etc.)	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
					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/ guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
					Refer Annexure A					

Place: Kolkata
Date: 29th May, 2023
UDIN: F008882E000406576

For VIDHYA BAID & CO.
Company Secretaries



Vidhya Baid
VIDHYA BAID
(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.

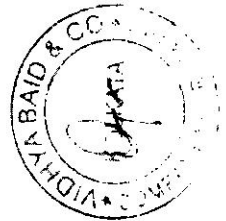
Place: Kolkata
Date: 29th May, 2023

For VIDHYA BAID & CO.
Company Secretaries

[Signature]
VIDHYA BAID
(Proprietor)
FCS No. 8882
CP No. 8686
PR NO. 649/2020

(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 Requirements (Regulations/circulars/guidelines including specific clause)	Regulation /Circular No.	Deviations	Action Taken by	Type of Action (Advisory/Clarification/ Fine/Show Cause Notice/ Warning, etc.)	Details of Violation	Fine Amount	Observations /Remarks of the Practicing Company Secretary	Management Response	Re-marks
1	Regulation 13(3) OF SEBI LODR Regulations, 2015	Regulation 13(3)	Delay in submission of Statement of Investor Complainants for the quarter ended 30th June 2022.			Delay in submission of Statement of Investor Complainants for the quarter ended 30th June 2022.		There was delay of 3 months (approx) in submission of the Report	As per the Management, since GST record as not been updated with the Depositories, Investor Grievance Redressal Report could not be generated by them which led to delay in submissions of Reports with the Exchange. The aforesaid reason for delay was intimated to NSE for their consideration and applied for waiver of fine	



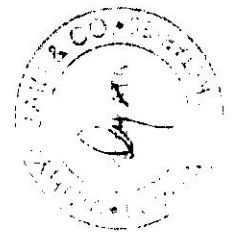
2.	Regulation 27(2) of SEBI LODR Regulations, 2015	Regulation 27(2)	Delay in submission of Corporate Governance Report for the quarter ended 30th June 2022.	NSE	Fine		Penalty of Rs. 9440/- including GST was imposed	There was delay of 4 days in submission of Report.	As Management was due to some technical issues with the system. The reason for delay was intimated to NSE for their consideration and applicator waiver of fine.	per the Payment of NSE penalty to NSE is pending.
3	Under Regulation 23(9) of SEBI LODR Regulations 2015	Regulation 23(9)	No disclosure of Related Party Transactions has been made for the year ended 30th September 2022	NSE	Fine	No disclosure of Related Party Transactions has been made for the year ended 30th September 2022	Penalty of Rs 11800/- including GST was imposed	Penalty was paid by the Company		No disclosure made during the reporting period
4	Under Regulation 31(1)(b) of SEBI LODR Regulations 2015	Regulation 31(1)(b)	Delay in submission of Shareholding Pattern for the quarter ended 30th June 2022			Delay in submission of Shareholding Pattern for the quarter ended 30th June 2022		There was delay of 3 months (approx) in submission of the Report	As Management that since GST record as 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 reason for delay was intimated to NSE for their consideration and applicator waiver of fine.	



5.	Regulation 33 of SEBI LODR Regulations, 2015	Regulation 33	Delay in Adoption of Unaudited Financial Results for the quarter ended 30th June 2022	NSE	Fine	Delay in Adoption of Unaudited Financial Results for the quarter ended 30th June 2022.	Penalty of Rs. 82,600/- including GST was imposed.	There was delay of 14 days and penalty was paid by the Company	
6.	Under Regulation 7(3) of SEBI LODR Regulations, 2015	Regulation 7(3)	Non submission of Compliance Certificate certifying maintaining physical & electronic transfer facility for the half year ended 30th September 2022			Non submission of Compliance Certificate certifying maintaining physical & electronic transfer facility for the half year ended 30th September 2022		No disclosure made during the reporting period	As per the Management that since GST record as 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 aforesaid reason for delay was intimated to NSE for their consideration and applicator waiver of fine.
7.	Under Regulation 33(3)(d) of SEBI LODR Regulations, 2015	Regulation 33(3)(d)	Delay in submission of declaration under Regulation 33(3)(d) of the SEBI (LODR) Regulations, 2015			Delay in submission of declaration under Regulation 33(3)(d) of the SEBI (LODR) Regulations, 2015		There was delay of 61 days	Auditor was appointed by the CAAG
8.	Under Regulation 47 of SEBI LODR Regulations, 2015	Regulation 47	The listed entity has not published the information specified in the Regulation in newspaper r.t. publication of Unaudited Financial Results for the quarter ended 30th June 2022, 30th September			The listed entity has not published the information specified in the Regulation in newspaper r.t. publication of Unaudited Financial Results for the quarter ended 30th June 2022		No disclosure made during the reporting period	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 December 2022.



12	Under Regulation 30 of SEBI LODR Regulations 2015	Regulation 30	Delay in Intimation for Change in Key Managerial Person				Delay in Intimation of Change in Key Managerial Person which was to be given within twenty four hours from the occurrence of event or information.			
13	Under Regulation 51 of SEBI LODR Regulations 2015	Regulation 51	Delay in Intimation of LOE regarding Supreme Court for the Company is permitted to scale its Undisputed Stock trading in Bailundi Iron and Mines and Baglaburu Iron Ore Mines				Delay in Intimation regarding Order of Supreme Court that the Company is permitted to scale its Undisputed Stock Bailundi Iron and Mines and Baglaburu Iron Ore Mines			
14	Regulation 31(4) of the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeover) Regulations, 2011	Regulation 31(4)	No declaration under Regulation 31(4) of the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeover) Regulations, 2011 has been given for FY: 22-23				No declaration under Regulation 31(4) of the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeover) Regulations, 2011 has been given for FY: 22-23	No disclosure made during the reporting period	The Company has not complied under regulation 31(4) However The Company has complied the same under regulation 31(1) & (2) for the FY 2021-22.	



15	Under Regulation 55A of SEBI (Depository Participant) Regulations -	Delay in submission of Reconciliation of share capital audit report for the quarter ended 30th June 2022.				Delay in submission of Reconciliation of share capital audit report for the quarter ended 30th June 2022.			As per the Management 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 aforesaid reason for delay was intimated to NSE for their consideration and applied for waiver of fine.	
16	Under Regulation 17, 18, 19, 20(2), 21(2) of SEBI (LODR) Regulations 2015	Delay in submission of Reconciliation of share capital audit report for the quarter ended 30th June 2022.	NSE	Fine	Non appointment of Independent Directors in the Board of Directors, Audit Committee and Nomination Remuneration Committee.	Delay in submission of Reconciliation of share capital audit report for the quarter ended 30th June 2022.	Penalty of Rs.23,49,380/- vide letter dated 22.08.2022 including GST and was imposed and Penalty of Rs.11,94,180/- vide letter dated 21.11.2022 including GST was imposed		The Company has approached Ministry of Steel several times for Appointment of Independent Directors. The company has initiated to take corrective measures for the same. The aforesaid reason for delay was intimated to NSE for their consideration and applied for waiver of fine.	
17	Regulation 3(5) and 3(6) of SEBI (PTI) Regulations, 2015	Delay in submission of Reconciliation of share capital audit report for the quarter ended 30th June 2022.			Non appointment of Independent Directors in the Board of Directors, Audit Committee and Nomination Remuneration Committee.	Delay in submission of Reconciliation of share capital audit report for the quarter ended 30th June 2022.			The said requires Digital Database (SDD) to be maintained by the company but the Company has purchased the said software on	Due to critical financial position the company delay in purchasing SDD software. However installed the SDD software on March 2023 and updated all

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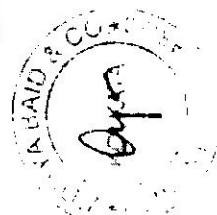
						<p>received for Quarter Ended December 2021, imposing penalties amounting to Rs. 15,45,800(including GST).</p>	<p>fault on the part of the Company. Moreover as per the Management, 3 Independent Directors has been appointed since November 2021. Payment of penalties are pending.</p>		
2	Under Regulation 7(3) of SEBI LODR Regulations 2015	Regulation 7(3)	Compliance Certificate for the quarter ended 31st March 2022 has not been submitted	Compliance Certificate for the quarter ended 31st March 2022 has not been submitted				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.	Payment of penalty to NSE is pending
3	Under Regulation 13(3) of SEBI LODR Regulations, 2015 and Under Regulation 31(1)(b) of SEBI LODR Regulations 2015	Regulation 13(3) and Regulation 31(1)	Statement of Investor Complaints 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	Five	Notice dated 16.05.2022 received for Quarter Ended March 2022, imposing penalties amounting to Rs. 88,500 including GST.		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	Payment of penalty to NSE is pending



4	Under SEBI (Prohibition of Insider Trading) Regulations, 2015	SEBI (Prohibition of Insider Trading) Regulations, 2015	Delay in intimation of Closure of Trading window for declaration of Financial Results				Delay in intimation of Closure of Trading window for declaration of Financial Results		Complied by the Company	
5	Under Regulation 14 of SEBI LOOR Regulations 2015	Regulation 14	Payment of Listing Fees for the year ended 31st March 2022 with CSE				Payment of Listing Fees for the year ended 31st March 2022		Complied by the Company	
6	Under Regulation 27(2) of SEBI LOOR Regulations 2015	Regulation 27(2)	Delay in submission of Corporate Governance Report for the quarter ended 31st March 2022	NSE	Fine		Delay in submission of Corporate Governance Report for the quarter ended 31st March 2022.	Penalty has been imposed by NSE, please share amount	Complied by the Company	Payment of penalty to NSE is pending



7	Under Regulation 23 (9) of SEBI LODR Regulations 2015	Under Regulation 23 (9)	Delay in disclosure of Related Party Transactions for the year ended 31st March 2022	NSE	Fine	Delay in disclosure of Related Party Transactions for the year ended 31st March 2022	Delay in disclosure of Related Party Transactions for the year ended 31st March 2022	Notice dated 14.01.2022 received for Quarter Ended September 2021, imposing penalties amounting to Rs. 158800 (including GST).	Delay in Reporting.	The aforesaid reason for delay was intimated to NSE for their consideration and noted for future compliance	
8	Under Regulation 24A of SEBI LODR Regulations 2015	Regulation 24A	Delay in submission of Annual/Secretarial Compliance Report for the year ended 31st March, 2021 and 31st March, 2022	NSE	Fine	Delay in submission of Annual/Secretarial Compliance Report for the year ended 31st March, 2021 and 31st March, 2022	Delay in Reporting.	Notice dated 29.06.2022 received for the year ended March 2022, imposing penalties amounting to Rs. 70,800 (including GST)	Delay in Reporting.	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	Payment of penalty to NSE is pending
9	Under Regulation 30 of SEBI LODR Regulations 2015	Regulation 30	Intimation for Change in Directors and Key Managerial Persons to be given within twenty four hours from the occurrence of event or information			Intimation for Change in Directors and Key Managerial Persons to be given within twenty four hours from the occurrence of event or information	No disclosure made during the reporting period.				



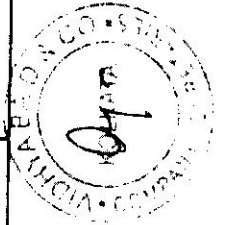
10	Under Regulation 34(1) of SEBI LODR Regulations 2015	Regulation 34(1)	Delay in submission of Annual Report for the year ended 31st March 2021			Delay in submission of Annual Report for the year ended 31st March 2021	Delay in Reporting.		
11	Under Regulation 55A of SEBI LODR Regulations 2015	Regulation 55A	Delay in submission of Reconciliation 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 31st March 2022			Delay in submission of Reconciliation 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 31st March 2022	Corrective measures been undertaken	As per the Management that since GST record has not been updated with the Depositories, by them which led to delay in submissions of Reports with the Exchange	
12	Under Regulation 47 of SEBI LODR Regulations 2015	Regulation 47	The listed entity has not published the information specified in the Regulation in newspaper simultaneously with the submission of the same to the stock exchange(s)			No disclosure made during the reporting period under the said Regulation	Corrective measures been undertaken	The company took steps to comply with the same and has complied since December 2022	



13	Under Regulation 40(9) of SEBI LODR Regulations 2015	Regulation 40(9)			Delay in submission of Compliance certificate for the year ended 31st March 2022		Delay in Reporting.	Corrective measures been undertaken		
14	Under Regulation 74(4) and 74(5) of the SEBI (Depositories and Participants) Regulations 2015	Regulation 74(4) and 74(5)			Quarterly Disclosure under the said Regulation has not been made.		No disclosure made during the reporting period.			

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

Sr No	Compliance Requirement (Regulations/circulars/signature including specific clause)	Regulation/Circular No.	Deviations	Action Taken	Type of Action	Details of Violation	Fine Amount	Observations/Remarks of the Practising Company Secretary	Management Response	Remarks
				Yes						



1	Under Regulation 74(4) and 74(5) of the SEBI (Depositories and Participants) Regulations 2015	74(4) Quarterly Disclosure under the said Regulation has not been made	Quarterly Disclosure under the said Regulation has not been made	No disclosure made during the reporting period	
2	Regulation 14 SEBI LODR Regulations 2015	Regulation 14 has not been paid for Calcutta Stock Exchange Limited	Listing fees for FY 2018-19 has not been paid for Calcutta Stock Exchange Limited	Non-payment of fees	Due to critical financial position, the company delayed paying the listing fees for FY 2018-19.

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

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