



WHITE ORGANIC AGRO LIMITED

Formerly known as WHITE DIAMOND INDUSTRIES LTD.

312A, Kailas Plaza, VallabhBaug Lane, Ghatkopar (East), Mumbai - 400 077. INDIA
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Email: info@whiteorganicagro.com; CIN: L01100MH1990PLC055860

19th August, 2020

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 31st March, 2020

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 2019-20.

Kindly take the above on your record.

Thanking You,

Yours faithfully

For White Organic Agro Limited
(Formerly known as White Diamond Industries Limited)

Darshak Rupani
Managing Director
DIN: 03121939

Secretarial Compliance Report of White Organic Agro Limited

I Rachana Maru, 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 31st March, 2020 (“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.	SEBI (LODR), Regulations 2015-Reg. 30 (2)	Aforesaid regulation provides for disclosures of any events or information, specified in Para A of Schedule III, deemed to be material events and listed entity shall make disclosure of such events. During reporting period, the Board of Directors have divested its share in Future Farms LLP.	As explained by the management, On account of the sudden COVID Lockdown and closure of offices, as per guidelines issued by the Government since first week of March 2020, the documentation could not be concluded consequent to which the intimation to the exchange and other regulator shall be done in due course.

- 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 : 19/08/2020

Rachana J. Maru
Company Secretary in Whole Time Practice
ACS No. 41825
CP No. 16210
UDIN: A041825B000595510