



AASHISH K. BHATT & ASSOCIATES

Practicing Company Secretaries

Aashish K. Bhatt
B.Com., A.C.S., PGDSL

**SECRETARIAL COMPLIANCE REPORT OF
EVEREST KANTO CYLINDER LIMITED
FOR THE YEAR ENDED 31ST MARCH, 2021**

[Pursuant to SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 08th February, 2019]

To,
Everest Kanto Cylinder Limited,
204, Raheja Centre, Free Press Journal Marg,
214, Nariman Point Mumbai – 400021.

I, have examined:

- a) all the documents and records made available to us and explanation provided by **Everest Kanto Cylinder 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, 2021 (“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”);

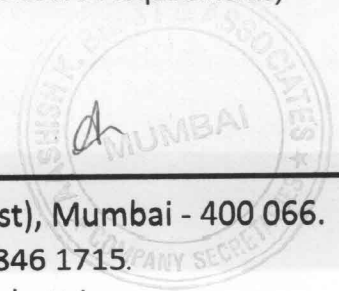
The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include:-

- a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“SEBI Listing Regulation”);

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- b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 – Not Applicable;
- 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;
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 - Not Applicable;
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 – Not Applicable;
- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 – Not Applicable;
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

And circulars/ guidelines issued thereunder and 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.	As per SEBI (Prohibition of Insider Trading) Regulations, 2015, trading of Equity Shares of the Company by Designated Persons during the period of closure of trading window is restricted and the listed entity		Violations observed under SEBI (Prohibition of Insider Trading) Regulations, 2015 for trading by Designated Persons during the period of closure of trading window. Penalty was levied by the Company



	shall promptly intimate the same to stock exchange(s) and SEBI.		however, there was delay in prompt submission to stock exchange(s) and SEBI.
2.	Pursuant to regulation 23(9) of SEBI Listing Regulations, the listed entity shall submit disclosures of Related Party Transactions on a consolidated basis within 30 days from the date of publication of its standalone and consolidated financial results for the half year.		Delay in submission of disclosures of Related Party Transactions on a consolidated basis for half year ended March 31, 2020.
3.	As per regulation 30 of SEBI Listing Regulations, Outcome of meeting of Board of Directors in which Financial Results have been approved are to be disclosed to Stock Exchange(s) within 30 minutes of the closure of meeting and disclosure under regulation 30 are to be disclosed to Stock Exchange(s) within 24 hours from the occurrence of event.		Delay in submission of Outcome of Board meetings during the period under review and disclosure w.r.t. investment and disinvestment under regulation 30 to Stock Exchange(s).
4.	Regulation 33(3)(d) of SEBI Listing Regulations states in case of audit reports with unmodified opinion(s), the listed entity shall furnish a declaration to that effect to the Stock Exchange(s) while publishing the annual audited financial results.		The Company has not furnished a separate declaration of unmodified opinion while publishing the annual Audited Financial Results for the year ended 31.03.2020 although the Outcome of the Board Meeting dated July 10, 2020 specifies that the Auditors Opinion is unmodified.
5.	As per Regulation 47 of SEBI Listing Regulations, the listed entity shall publish notice of meeting of		Intimation under regulation 29 of SEBI Listing Regulation for board meeting to be held on 10.07.2020



the board of directors where financial results shall be discussed and notices given to shareholders by advertisement.	was not published in English or regional language daily newspaper and there was a delay in newspaper publication of Annual General Meeting Notice given to shareholders.
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- a) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from my examination of those records.
- b) 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 letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
	Nil	Nil	Nil	Nil

- c) 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 31.03.2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
Necessary actions were taken by Company w.r.t. observations in previous reports.				



On account of pandemic "COVID 2019" and nationwide lockdown imposed by governments, the audit process has been modified, wherein certain documents/records etc. were verified in electronic mode and have relied on the representations received from the Company for its accuracy and authenticity.

**For Aashish K. Bhatt & Associates
Company Secretaries**



Aashish Bhatt

Proprietor

ACS No.: 19639, COP No.: 7023

UDIN: A019639C000547936

Place: Mumbai

Date: 24.06.2021

