

AASHISH K. BHATT & ASSOCIATES

Practicing Company Secretaries

SECRETARIAL COMPLIANCE REPORT OF FOR THE FINANCIAL YEAR ENDED MARCH 31, 2023

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

To.

Everest Kanto Cylinder Limited.

I have examined:

- a) all the documents and records made available to us and explanation provided by M/s. Everest Kanto Cylinder 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 March 31, 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 (the "Listing Regulations");
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations,
 2018 Not Applicable;

Mob.: 98671 51081, 80979 85754 ● Telefax: 022 2846 1715. Email: mail@aashishbhatt.in ● W.: www.aashishbhatt.in

- 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 and Sweat Equity) Regulations, 2021 Not Applicable;
- Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 - Not Applicable;
- g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; and circulars/ guidelines issued thereunder;

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

Sr No.	Particulars	Compliance Status (Yes / No / NA)	Observation / Remarks by PCS
1.	Secretarial Standards: 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.	Yes	
2.	Adoption and timely updation of the Policies: 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	
3.	Maintenance and disclosures on Website: The Listed entity is maintaining a functional website	Yes	

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 redirects to the relevant document(s)/ section of the website Disqualification of Director: None of the Director of the Company is/are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity. Details related to Subsidiaries of listed entities have been examined w.r.t.: (a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries 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 CDR Regulations, 2015. Performance Evaluation: 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 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. Pisclosure of events or information: Yes			
Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which redirects to the relevant document(s)/ section of the website Disqualification of Director: None of the Director of the Company is/are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity. Details related to Subsidiaries of listed entities have been examined w.r.t.: (a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries (b) Disclosure requirement of material as well as other subsidiaries (b) Disclosure requirement of material as well as other subsidiaries (b) Disclosure requirement of material as well as other subsidiaries (b) Disclosure requirement of material as well as other subsidiaries (b) Disclosure requirement of material as well as other subsidiaries (b) Disclosure requirement of material as well as other subsidiaries (b) Disclosure requirement of material as well as other subsidiaries (b) Disclosure requirement of material as well as other subsidiaries (c) Disclosure requirement of material as well as other subsidiaries (c) Disclosure requirement of material as well as other subsidiaries (c) Disclosure requirement of material as well as other subsidiaries (c) Disclosure requirement of material as well as other subsidiaries (c) Disclosure requirement of material as well as other subsidiaries (c) Disclosure requirement of material as well as other subsidiaries (c) Disclosure requirement of material as well as other subsidiaries (c) Disclosure requirement of material as well as other subsidiaries (c) Disclosure requirement of material as well as other subsidiaries (c) Disclosure requirement of material as well as other subsidiaries (c) Disclosure requirement of material as well as other subsidiaries (c) Disclosure requirement of material as well as other subsidiaries (d) Disclosure requirement of material as well as other subsidiaries (d) Disclosure requirement of material as well a		 Timely dissemination of the documents/ information under a 	
under Regulation 27(2) are accurate and specific which redirects to the relevant document(s)/ section of the website 31.03.2022 4. Disqualification of Director: None of the Director of the Company is/are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity. 5. Details related to Subsidiaries of listed entities have been examined w.r.t.: (a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries 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. 7. Performance Evaluation: 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 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.		separate section on the website	Web-links are
directs to the relevant document(s)/ section of the website Disqualification of Director: Yes		Web-links provided in annual corporate governance reports	not specific in
4. Disqualification of Director: None of the Director of the Company is/are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity. 5. Details related to Subsidiaries of listed entities have been examined w.r.t.: (a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries 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. 7. Performance Evaluation: 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 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.		under Regulation 27(2) are accurate and specific which re-	CG Report
4. Disqualification of Director: None of the Director of the Company is/are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity. 5. Details related to Subsidiaries of listed entities have been examined w.r.t.: (a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries 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. 7. Performance Evaluation: 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 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.		directs to the relevant document(s)/ section of the website	filed for
None of the Director of the Company is/are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity. 5. Details related to Subsidiaries of listed entities have been examined w.r.t.: (a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries 6. Preservation of Documents: The listed entity is preserving and maintaining records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI Regulations, 2015. 7. Performance Evaluation: 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. 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.			31.03.2022
Section 164 of Companies Act, 2013 as confirmed by the listed entity. 5. Details related to Subsidiaries of listed entities have been examined w.r.t.: (a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries 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. 7. Performance Evaluation: 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 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.	4.	Disqualification of Director:	Yes
entity. 5. Details related to Subsidiaries of listed entities have been examined w.r.t.: (a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries 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. 7. Performance Evaluation: 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 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.		None of the Director of the Company is/are disqualified under	
Section 1. Details related to Subsidiaries of listed entities have been examined w.r.t.: (a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries 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. 7. Performance Evaluation: 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 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.		Section 164 of Companies Act, 2013 as confirmed by the listed	
examined w.r.t.: (a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries 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. 7. Performance Evaluation: 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 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.		entity.	· ·
(a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries 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. 7. Performance Evaluation: 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 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.	5.	Details related to Subsidiaries of listed entities have been	Yes
(b) Disclosure requirement of material as well as other subsidiaries 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. 7. Performance Evaluation: 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 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.		examined w.r.t.:	
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. 7. Performance Evaluation: 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 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.		(a) Identification of material subsidiary companies	
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. 7. Performance Evaluation: 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 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.		(b) Disclosure requirement of material as well as other subsidiaries	
prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015. 7. Performance Evaluation: 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 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.	6.	Preservation of Documents:	Yes
prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015. 7. Performance Evaluation: 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 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.		The listed entity is preserving and maintaining records as	
Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015. 7. Performance Evaluation: 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 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.			
under SEBI LODR Regulations, 2015. Performance Evaluation: 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 Regulations 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.			
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 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.			
Board, Independent Directors and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations 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.	7.	Performance Evaluation:	Yes
Board, Independent Directors and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations 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.		The listed entity has conducted performance evaluation of the	
every financial year/during the financial year as prescribed in SEBI Regulations 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.			
Regulations 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.			
(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.			
(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.	8.	Related Party Transactions:	Yes
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.		(a) The listed entity has obtained prior approval of Audit Committee	
confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.			
confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.			
confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.		(b) The listed entity has provided detailed reasons along with	
approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.			
approval has been obtained.			
Disclosure of events or information: Yes			
100	9.	Disclosure of events or information:	Yes

	No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	
12.	Additional Non-compliances, if any:	Yes
	circulars/ guidelines issued thereunder except as provided under separate paragraph herein (**).	
	SEBI through various circulars) under SEBI Regulations and	
	(including under the Standard Operating Procedures issued by	
	directors/ subsidiaries either by SEBI or by Stock Exchanges	
	No actions has been taken against the listed entity/ its promoters/	
11.	Actions taken by SEBI or Stock Exchange(s), if any:	Yes
	(Prohibition of Insider Trading) Regulations, 2015	*
	The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI	
10.	Prohibition of Insider Trading:	Yes
	2015 within the time limits prescribed thereunder.	
	Regulation 30 along with Schedule III of SEBI LODR Regulations,	
	The listed entity has provided all the required disclosure(s) under	

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:

Sr	Particulars	Compliance	Observations
No.		Status	/Remarks by
		(Yes/No/ NA)	PCS*
1.	Compliances with the following conditions whi	le appointing/re-appointing an	auditor

i. If the auditor has resigned within 45 days from the end of a	NA	
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	NA	
the flext quarter, of		
iii If the guditar has signed the Unit of the surface of the Unit of the surface	NA	
quarter of such financial year as well as the audit report for such		
financial year.		
Other conditions relating to resignation of statutory auditor		
i. Reporting of concerns by Auditor with respect to the listed	NA	
a. In case of any concern with the management of the listed		
waiting for the quarterly Audit Committee meetings.		
b la constitue sustitue		
been brought to the notice of the Audit Committee. In cases where		
the managed and the Control of the c		
the proposed resignation is due to non-receipt of information /		
explanation from the company, the auditor has informed the Audit		
	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 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. Other conditions relating to resignation of statutory auditor 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 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	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 the next quarter; or NA 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. Other conditions relating to resignation of statutory auditor 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 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

	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 information as required by the auditor.		
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 18th October, 2019.	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.	Complian	Regulat	Deviatio	Acti	Тур	Detail	Fine	Observati	Managem	Rem
No	се	ion /	ns	on	e of	s of	Amou	ons/	ent	arks
	Requirem	Circular		Take	Acti	Violati	nt	Remarks	Respons	
	ent	No.		n	on	on		of the	е	
	(Regulati			by		1711		Practicin		
	ons /							g		
	circulars /							Company		
	guideline							Secretary		
	s									
	including									
	specific									
	clause)									
					NA			ų.		

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

Sr.	Compliance Requirement	Regulation /	Deviati	Action	Type of
No	(Regulations / circulars / guidelines	Circular No.	ons	Taken	Action
•	including specific clause)			by 💀	
1.	Pursuant to regulation 18 of SEBI Listing Regulations, the Audit Committee shall meet at least four times in a year and not more than one hundred and twenty days shall elapse between two meetings.	Regulation 18 of SEBI Listing Regulations, 2015		NA	NA
2.	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.	Regulation 30 of SEBI Listing Regulations, 2015		NA	NA
3.	Regulation 30(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 states that the promoter of every target company shall together with persons acting in concert with him, disclose their aggregate shareholding and voting rights as of the thirty-first day of March, in such target company and as per regulation 30(3) of aforesaid regulation, the promoter shall within seven working days from the end of each financial year submit the disclosure under regulation 30(2) to every stock exchange where the shares of the target company are listed	Regulation 30(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011		NA	NA

	and the target company at its			Ø.	Name of the
	registered office.				
4.	As per regulation 31(4) of SEBI	Regulation 31(4) of	N	IA	NA
	(Substantial Acquisition of Shares and	SEBI (Substantial	I.	14	NA
	Takeovers) Regulations, 2011, the	Acquisition of		ā	
	promoter of every target company shall	Shares and			
	declare on a yearly basis that they,	Takeovers)			
	along with persons acting in concert,	Regulations, 2011			
	has not made any encumbrance,				
	directly or indirectly, other than those			*	
	already disclosed during the financial				
	year and pursuant to regulation 31(5)				
	of aforesaid regulation, declaration as				
	per regulation 31(4) shall be made				
	within seven working days from the				
	end of each financial year to every				
	stock exchange where the shares of				
	the target company are listed and the				
	audit committee of the target company.			- b	
5.	As per SEBI (Prohibition of Insider	SEBI (Prohibition of	N	Δ	NA
	Trading) Regulations, 2015 and SEBI	Insider Trading)			INA
	Circular dated 23.07.2020 w.r.t.	Regulations, 2015			
	Reporting to Stock Exchanges	and SEBI Circular			
	regarding violations under SEBI	dated 23.07.2020			
	(Prohibition of Insider Trading)	w.r.t. Reporting to			
	Regulations, 2015 relating to the Code	Stock Exchanges			
	of Conduct (CoC), trading of Equity	regarding violations			
	Shares of the Company by Designated	under SEBI			
	Persons during the period of closure of	(Prohibition of			
	trading window is restricted and the	Insider Trading)			
	listed company shall promptly intimate	Regulations, 2015			
	the same to the Stock Exchange(s).				

		relating to the Code	8	
		of Conduct (CoC)		
6.	Pursuant to regulation 7(2) of SEBI	Regulation 7(2) of	NA	NA
	(Prohibition of Insider Trading)	SEBI (Prohibition of		
	Regulations, 2015, designated person	Insider Trading)		
	shall disclose to the company the	Regulations, 2015		
	number of such securities acquired or			
	disposed of within two trading days of			
	such transaction if the value of the			
	securities traded, whether in one			
*	transaction or a series of transactions			
	over any calendar quarter, aggregates			
	to a traded value in excess of ten lakh			
	rupees or such other value as may be			
	specified.		- 10	

Details of	Fine	Observations/ Remarks	Management	Remar
Violation	Amount	of the Practicing	Response	ks
		Company Secretary	7	
During the period under		During the period under	Since, there were no	19.55
review, the gap between		review, the gap between	other matters to discuss	
two Audit Committee		two Audit Committee	by Audit Committee, the	
meetings have elapsed		meetings have elapsed	meeting was conducted	
one hundred and twenty		one hundred and twenty	on June 24, 2021 for	
days.		days.	adoption of financial	
Since, there were no other		Since, there were no other	results along with other	
matters to discuss by Audit		matters to discuss by Audit	agenda matters.	
Committee, the meeting		Committee, the meeting		
was conducted on June		was conducted on June 24,	Hence, there was a gap	
24, 2021 for adoption of		2021 for adoption of	of more than 120 days	
			from the previous Audit	

financial results along with	financial results along with	Committee Meeting
other agenda matters.	other agenda matters.	held on February 13,
Hence, there was a gap of	Hence, there was a gap of	
more than 120 days from	more than 120 days from	2021.
the previous Audit	the previous Audit	
Committee Meeting held	Committee Meeting held	
on February 13, 2021.	on February 13, 2021.	
There was a delay of 41	There was a delay of 41	Filed but delay due to
minutes in submission of	minutes in submission of	
Outcome of meeting of	Outcome of meeting of	tooriiiiodi rodooni
Board of Directors held on	Board of Directors held on	
24.06.2021 during the	24.06.2021 during the	
period under review.	period under review.	
Delay in submission of	Delay in submission of	Filed but delay due to
Disclosures under	Disclosures under	
regulation 30(2) of SEBI	regulation 30(2) of SEBI	
(Substantial Acquisition of	(Substantial Acquisition of	
Shares and Takeovers)	Shares and Takeovers)	
Regulations, 2011 by the	Regulations, 2011 by the	
company to the Stock	company to the Stock	
Exchange(s).	Exchange(s).	
Delay in submission of	Delay in submission of	Filed but delay due to
Declarations under	Declarations under	technical reason
regulation 31(4) of SEBI	regulation 31(4) of SEBI	
(Substantial Acquisition of	(Substantial Acquisition of	
Shares and Takeovers)	Shares and Takeovers)	
Regulations, 2011 by the	Regulations, 2011 by the	
company to the Stock	company to the Stock	
Exchange(s).	Exchange(s).	
Violations observed under	Violations observed under	Technical error
SEBI (Prohibition of Insider	SEBI (Prohibition of Insider	
Trading) Regulations,	Trading) Regulations,	
2015 and Code of	2015 and Code of	

Practices and Procedures	Practices and Procedures
for Fair Disclosure of	for Fair Disclosure of
Unpublished Price	Unpublished Price
Sensitive Information for	Sensitive Information for
trading by Designated	trading by Designated
Person during the period of	Person during the period of
closure of trading window,	closure of trading window,
who was newly appointed.	who was newly appointed.
There was delay in prompt	There was delay in prompt
submission to stock	submission to stock
exchange(s).	exchange(s).
Delay in submission of	Delay in submission of Filed but delay due to
disclosure under regulation	disclosure under regulation technical reason
7(2) of SEBI (Prohibition of	7(2) of SEBI (Prohibition of
Insider Trading)	Insider Trading)
Regulations, 2015 by the	Regulations, 2015 by the
Company to the Stock	Company to the Stock
Exchange(s).	Exchange(s).

For Aashish K. Bhatt & Associates
Company Secretaries

Aashish K. Bhatt

Proprietor

Membership No.: 19639

UDIN: A019639E000361981

Peer Review Certificate No.: 2959/2023

Date: 23.05.2023

Place: Mumbai