NGL Fine-Chem Limited

Regd. Office 301, E – Square, Subhash Road, Vile Parle East, Mumbai 400057 Maharashtra, India.
Tel.: (+91 22) 40842222, Fax: (+91 22) 2610 8030, Email: info@nglfinechem.com CIN L24110MH1981PLC025884,Website www.nglfinechem.com

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Ref:- NGL Fine-Chem Limited
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HSPN & ASSOCIATES LLP
COMPANY SECRETARIES
LLPIN: AAZ-8456 I Unique Code: L2021MHE011400
(Formerly known as HS ASSOCIATES
Unique Code: P2007MH004300)

HEMANT S. SHETYE (Designated Partner)
B.COM., LLB(Gen.), FCS
Insolvency Professional

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ANNUAL SECRETARIAL COMPLIANCE REPORT

(Pursuant to Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations 2015

Secretarial Compliance Report of NGL Fine - Chem Limited for the financial year ended 31st March, 2023.

I have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by NGL Fine - Chem Limited, having its Registered Office at 301, E Square Subhash Road, Vile Parle (East) Mumbai MH 400057 IN. Secretarial Review was conducted in a manner that provided me a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing our opinion thereon.

Based on my verification of the listed entity's books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Review, I hereby report that in my opinion, the listed entity has, during the review period covering the financial year ended on March 31, 2023, complied with the statutory provisions listed hereunder and also that the listed entity has proper Board processes and compliance mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

I, Hemant Shetye Designated Partner of HSPN & Associates LLP have examined:

(a) all the documents and records made available to me and explanation provided by NGL Fine-Chem 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, 2023 ("Review Period") in respect of compliance with the provisions of :

i. the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and

ii. 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 (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;

HSPN & ASSOCIATES LLP
CP No.1483
FCS No.2827
MUMBAI
COMPANY SECRETARIES

c) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

d) SEBI (Depositories and Participants) Regulations, 2018 erstwhile SEBI (Depositories and Participants) Regulations, 1996;

e) Annual Secretarial audit report and annual secretarial compliance report for listed entities as per SEBI circular CIR/CFD/CMD1/27/2019 dated February 08, 2019;

f) Standardized norms for transfer of securities in physical mode SEBI/HO/MIRSD/DOS3/CIR/P/2018/139 dated November 6, 2018;

g) Strengthening the Guidelines and Raising Industry standards for RTAs, Issuer Companies and Banker circular no. SEBI/HO/MIRSD/DOS3/CIR/P/2018/115 dated July16, 2018 read with SEBI circular No. SEBI/HO/MIRSD/DOP1/CIR/P/2018/73 dated April 20, 2018;

h) System-driven Disclosures in Securities Market as per SEBI circular SEBI/HO/CFD/DCR1/CIR/P/2018/85 dated May 28, 2018;

i) Monitoring of Foreign Investment limits in listed Indian companies SEBI circular IMD/FPIC/CIR/P/2018/74 dated April 27, 2018 read with SEBI Circular No. IMD/FPIC/CIR/P/2018/61 dated April 5, 2018;

j) Database for Distinctive Number (DN) of Shares as per SEBI circular SEBI/HO/MRD/DOP2DSA2/CIR/P/2019/87 dated August 01,2019;

k) Disclosure of significant beneficial ownership in the shareholding pattern as per SEBI circular SEBI/HO/CFD/CMD1/CIR/P/2019/36 dated March 12,2019;

l) Disclosures of standardizing reporting of violations related to code of conduct under SEBI (PIT), 2015 as per SEBI Circular HO/ISD/ISD/CIR/P/2019/82 dated 19' July 2019;

m) Violation of Insider Trading SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020;

n) E-VOTING Facility as per SEBI Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/242dated December 09, 2020;

o) Operational guidelines for Transfer and Dematerialization of re-lodged physical shares as per SEBI Circular No. SEBI/HO/MIRSD/RTAMB/CIR/P/2020/166 dated September 07, 2020;

p) Handling of Scores Complaints as per SEBI Circular No. SEBI/HO/OIAE/IGRD/CIR/P/2020/152 dated 13' August 2020;

q) Automation of System Driven Disclosures as per SEBI Circular No SEBI/HO/ISD/ISD/CIR/P/2020/168 dated September 09, 2020;

r) Common and Simplified Norms for processing investor's service requests by RTAs and norms for furnishing PAN, KYC details, and Nomination dated SEBI/HO/MIRSD/MIRSD_RTAMB/P/CIR/2021/655 November 03, 2021;

HSPN & ASSOCIATES LLP CP No.1483 FCS No.2827 MUMBAI COMPANY SECRETARIES

s) Issuance of Securities in dematerialized form in case of Investor Service Requests dated SEBI/HO/MIRSD/MIRSD_RTAMB/P/CIR/2022/8 January 25, 2022;

t) Format of compliance report on Corporate Governance by Listed Entities dated SEBI/HO/CFD/CMD-2/P/CIR/2021/567 May 31, 2021;

u) disclosure obligations of listed entities in relation to Related Party Transactions. SEBI/HO/CFD/CMD1/CIR/P/2021/662 dated November 22, 2021;

v) Automation of disclosure requirements under SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011-System Driven Disclosures - Ease of doing business circular no. SEBI/HO/CFD/DCR-3/P/CIR/2022/27 dated March 7, 2022

w) Standard Operating Procedures (SOP) for dispute resolution available under the stock exchange arbitration mechanism for disputes between a listed company and its shareholder(s) investor(s). Circular No.: SEBI/HO/CFD/SSEP/CIR/P/2022/48 dated April 08, 2022;

x) Clarification on applicability of Regulation 23(4) read with Regulation 23(3)(e) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 in relation to Related Party Transactions. Circular No.: SEBI/HO/CFD/CMD1/CIR/P/2022/47 dated April 8, 2022;

y) XBRL based filing of Statement of investor compliant under Regulation 13(3) for Listed Companies at BSE Notice No 20220412-39 dated April 12, 2022

z) Relaxation from compliance with certain provisions of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 Circular No: SEBI/HO/CFD/CMD2/CIR/P/2022/62 dated May 13,2022;

aa) Simplification of procedure and standardization of formats of documents for transmission of securities Circular No: SEBI/HO/MIRSD/MIRSD_RTAMB/P/CIR/2022/65 dated May 18, 2022;

bb) Investor Grievance Redressal Mechanism Circular No: SEBI/HO/MIRSD/DOS3/P/CIR/2 dated June 03, 2022;

cc) Disclosure of holding of specified securities and Holding of specified securities in dematerialized form Circular No: SEBI/HO/CFD/PoD-1/P/CIR/2022/92 dated June 30,2022

dd) Circular on use of digital signature certificate for announcements submitted by listed companies Notice No 20220801-24 dated August 01, 2022

ee) Relaxation from compliance with certain provisions of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 –Reg Circular No: SEBI/HO/CFD/PoD-2/P/CIR/2023/4 dated January 05, 2023;

ff) Filing of announcements in XBRL format on BSE Listing Centre Notice No; 20230127-37 dated January 27, 2023;

HSPN & ASSOCIATES LLP COMPANY SECRETARIES CP No.1483 FCS No.2827 MUMBAI

gg) Release of new module for filing of information required under Regulation 46 and 62 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 on BSE Listing Center Notice No 20230209-1 dated February 09, 2023.

I, Hemant Shetye designated partner of HSPN & Associates LLP, 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)	Observations /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)	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 has been reviewed & timely updated as per the regulations/circulars/guidelines issued by SEBI	Yes	-
3.	Maintenance and disclosures on Website: • 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	-
4.	Disqualification of Director: None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013	Yes	-
5.	To examine details related to Subsidiaries of listed entities: (a) Identification of material subsidiary companies (b) Requirements with respect to disclosure of material as well as other subsidiaries	Yes	-

HSPN & ASSOCIATES LLP
CP No.1483
FCS No.2827
MUMBAI
COMPANY SECRETARIES

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 Committees at the start of every financial year as prescribed in SEBI Regulations	Yes	-
*8.	Related Party Transactions: (a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions (b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit committee	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.	No	The Outcome of Investor / Analyst meet is not intimated to stock exchange for Investor / Analyst meet held on 26.08.2022, 02.09.2022, 06.09.2022, 16.09.2022, 30.09.2022
10.	Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	Yes	
11.	Actions taken by SEBI or Stock Exchange(s), if any: No Actions 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	No.	The company has received mailS from SEBI on 25th November, 2022, 23rd February, 2023 and 23rd March, 2023 seeking clarification with regard to variation in Shareholding Pattern of the Company of June 2019 and September 2019. The Company replied that PCI Ferrmone Chemicals (India) Pvt Ltd. ("PCI") is a promoter group company of NGL since 1997 whose shareholding in NGL was erroneously disclosed under the 'public

HSPN & ASSOCIATES LLP
CP No.1483
FCS No.2827
MUMBAI
COMPANY SECRETARIES

			shareholder' category. The unintentional error was rectified by disclosing PCI under the 'promoter and promoter group' category of NGL for the quarter ended September 2019. As on date of signing this report there is no further action from SEBI.
12.	Additional Non-compliances, if any: No any additional non-compliance observed for all SEBI regulation/circular/guidance note etc.	Yes	

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: **Not Applicable for the period under review.**

Sr. No.	**Particulars**	**Compliance Status (Yes/No/ NA)**	**Observation /Remarks by PCS**
1.	**Compliances with the following conditions while appointing/re-appointing 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 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 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		

HSPN & ASSOCIATES LLP COMPANY SECRETARIES CP No.1483 FCS No.2827 MUMBAI

	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		

s been brought to the Audit Committee. In cases oposed resignation is due to of information / from the company, the informed the Audit e details of information/ ought and not provided by ent, as applicable Committee / Board of the case may be, n the matter on receipt of ion from the auditor relating sal to resign as mentioned mmunicate its views to the and the auditor. in case of non-receipt of as provided an appropriate its audit report, which is ce with the Standards of pecified by ICAI / NFRA, in e listed entity/ its material has not provided as required by the auditor.			
entity / its material has obtained information ditor upon resignation, in s specified in Annexure- A in Circular CIR/ /114/2019 dated 18th 9.			

	documents h notice of the where the p non-receipt explanation auditor ha Committee t explanation s the managem c.The Audit Directors, as deliberated such informa to the propo above and co management ii. Disclaime information: The auditor disclaimer in in accordar Auditing as s case where t subsidiary information
3.	The listed subsidiary from the A the format SEBI CFD/CMD October, 20

HSPN & ASSOCIATES LLP
CP No.1483
FCS No.2827
MUMBAI
COMPANY SECRETARIES

(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	Details of Violation	Fine Amount	Observations/Remarks of the Practicing Company Secretary	Management Response	Remarks
1	Regulation 30(6) read with Part A of Schedule III of SEBI (LODR) 2015: The Listed Entity Shall disclose to stock exchange all events as specified in Part A of Schedule III of SEBI(LODR), 2015 as soon as possible and not later than twenty four hours from the occurrence of event or information	Regulation 30(6) read with Part A of Schedule III of SEBI (LODR) 2015	Outcome of Investor / Analyst meet was not given in some cases although intimation was given.	NA	NA	NA	NA	In some of the cases the Intimation of Investor / Analyst meet was given however the outcome of the same was not intimated to the stock exchange	Since the Investor / Analyst meet was generic in nature and no UPSI was shared the management is of the opinion that outcome of the same is not required to be given	

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

(i) 31st March, 2022

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 for the year ended 2022	Management Response	Remarks

HSPN & ASSOCIATES LLP COMPANY SECRETARIES CP No.1483 FCS No.2827 MUMBAI

1	Regulation 17(1) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015: The Board of Directors of Top 500 Listed Entities shall have at least one Independent Women Director w.e.f April 1, 2019 and the Board of Directors of top 1000 listed entities shall have atleast one Independent Woman Director by April 1, 2020.	Reg 17(1) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015:	The Company was in top 1000 Listed entity list as on April 1, 2021. Hence the Company was required to appoint a Women Independent Director. There was a delay in appointment of Women Independent Director.	BSE limited	Penalty	There was a Delay of 76 days in appointment of Women Independent Director	4,36,000 (Four Lakhs Thirty Six Thousand)	The Company made the Compliance good by appointing Ms. Sarala Menon (DIN: 09433901) as a Non Executive Women Independent Director w.e.f 14th December, 2021 for a term of five year and paid the requisite fine levied by BSE Limited for December, 2021 Quarter	The Company Has made the Compliance by appointment of Independent Women Director	The composition of Director is in accordance with Regulation 17(1) of SEBI (LODR) 2015.
2	Regulation 17(2) and 18(2) of SEBI (LODR), 2015: As per 17(2) the maximum time gap between two Board Meetings is 120 (One Hundred and Twenty) Days. As per 18(2) the maximum time gap between two Audit Committee Meetings is 120 (one Hundred and Twenty) Days	Reg 17(2) and 18(2) of SEBI (LODR) Regulations, 2015	During the quarter ended 30th June, 2021, the maximum time gap between two Board Meetings and Two Audit Committee Meetings exceeded beyond 120 (One Hundred and Twenty) days.	NA	NA	NA	NA	The time gap between two Board Meetings and Two Audit Committee Meetings during the quarter ended 30th June, 2021 exceeded by 3 days.	The Company has taken abundant precaution and there is no occurrence of the same.	There is no occurrence of the same during the year under review

HSPN & ASSOCIATES LLP
CP No. 1483
FCS No. 2827
MUMBAI
COMPANY SECRETARIES

3	Intimation of Closure of Trading window to be given prior to beginning of the Quarter.	SEBI (Prohibition of Insider Trading) Regulations, 2015 BSE Circular dated 02nd April 2019 vide Ref No. LIST/COMP/01/2019-20	The Closure of trading window for the quarter ended 30th September 2021 intimated on 02nd October 2021	NA	NA	NA	NA	Delay in submission of notice Closure of trading window for quarter ended 30th September 2021.	The Company has taken abundant precaution and there is no occurrence of the same.	There is no occurrence of the same during the year under review.
4	Outcome of Financial Results	Regulation 33 of SEBI	The pdf filing of the	NA	NA	NA	NA	Minor Delay in submission	The Company has taken	There is no occurrence

5	XBRL filing of Financial Results for December, 2021 Quarter pursuant to Regulation 33 of SEBI (Listing Obligations and Disclosure Requirements) regulations, 2015 read with BSE Circular DCS/COMP/28/2016-17 March 30, 2017 within 24hours of submission of PDF	Regulation 33 of SEBI (Listing Obligations and Disclosure Requirements) regulations, 2015 read with BSE Circular DCS/COMP/28/-17 March 30, 2017	The XBRL filing of the financial results for the quarter ended 31st December 2021 has been uploaded beyond 24 hours of submission of results in PDF mode.	NA	NA	NA	NA	Delay in submission of XBRL filing of the financial results	The Company has taken abundant precaution and there is no re-occurrence of the same	There is no occurrence of delay in submission of XBRL filing of financials during the year under review
6	Transfer of Unclaimed shares to "Demat Suspense Account/Unclaimed Suspense Account".	Regulation 39(4) of (Listing Obligations and Disclosure Requirements) regulations, 2015	There are 400 Shares belonging to 4 Shareholders lying unclaimed which are yet to be transferred to "Demat Suspense Account/ Unclaimed Suspense Account".	NA	NA	NA	NA	During the year there are 400 shares held by 4 shareholders constituting 0.0065% of the total paid up Equity Share Capital of the Company lying unclaimed. The Company is taking all necessary steps to connect with the shareholders and deliver the Share certificate lying with the Company's	During the Financial Year 2022-23 400 Shares belonging to 4 shareholders have been transferred to Unclaimed Suspense Account	The Company have transferred the unclaimed shares to unclaimed suspense account.

HSPN & ASSOCIATES LLP
CP No.1483
FCS No.2827
MUMBAI
COMPANY SECRETARIES

								RTA. As informed by the Management that, in case there is no response from the concerned shareholders, the Company shall initiate the process for transfer of such unclaimed shares to Demat Suspense Account/ Unclaimed Suspense Account pursuant to Regulation 39 (4) of SEBI (LODR) 2015 during the Financial Year 2022-23;		

(ii) 31st March, 2021

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 for the year ended 2021	Management Response	Remarks
1	As Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) regulations, 2015 outcome of Board Meeting for financial results to be intimated	Regulation 30 of SEBI (LODR), 2015, read with Schedule III PART A	The Outcome of Board Meeting held for financial results for the quarter ended 31st March	NA	NA	NA	NA	The Outcome of Board Meeting held for financial results for the quarter ended 31st March 2020 has been uploaded beyond 30 minutes	The Outcome of Board Meeting have been uploaded within time in this reporting period	There is no occurrence of delay in submission of outcome during the year under review

	within 30 minutes of conclusion of Board Meeting		2020 has been uploaded beyond 30 minutes reckoned from the conclusion time of the respective Board Meeting.					reckoned from the conclusion time of the respective Board Meeting.	under review	
2	Regulation 33 of SEBI (Listing Obligations and Disclosure Requirements) regulations, 2015 read with BSE Circular DCS/COMP/28/ 2016-17 March 30, 2017 The pdf filing of the financial results for the quarter ended 31st March 2020 has been uploaded beyond 30 minutes reckoned from the conclusion time of the respective Board meeting.	Regulation 33 of SEBI (Listing Obligations and Disclosure Requirements) regulations, 2015 read with BSE Circular DCS/COMP/28/ 2016-17 March 30, 2017	The pdf filing of the financial results for the quarter ended 31st March 2020 has been uploaded beyond 30 minutes reckoned from the conclusion time of the respective Board meeting.	NA	NA	NA	NA	Its is observed that there is delay in pdf filing of financial results.	The Company has taken abundant precaution and there is no re-occurrence of the same during the period under review	There is no occurrence of delay in submission of pdf filing of financials during the year under review

(iii) 31st March, 2020

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 for the year ended 2020	Management Response	Remarks
1	Regulation 33 of SEBI (Listing Obligations and Disclosure Requirements) regulations, 2015 read with BSE Circular DCS/COMP/28 /2016-17 March 30, 2017 The XBRL of the financial results for the quarter ended 30th June, 2019 have been uploaded beyond 24 hours reckoned from the time of uploading of the pdf for the financial results.	Regulation 33 of SEBI (Listing Obligations and Disclosure Requirements) regulations, 2015 read with BSE Circular DCS/COMP/28/ 2016-17 March 30, 2017	The XBRL of the financial results for the quarter ended 30th June, 2019 have been uploaded beyond 24 hours reckoned from the time of uploading of the pdf for the financial	NA	NA	NA	NA	Its is observed that there is delay in XBRL filing of financial results.	The Company has taken abundant precaution and there is no re-occurrence of the same during the period under review	There is no occurrence of delay in submission of XBRL filing of financials during the year under review
2	Regulation 33	Regulati	The pdf	NA	NA	NA	NA			

	The pdf filing of the financial results for all the quarters of financial year 2019-2020 have been uploaded beyond 30 minutes reckoned from the conclusion of respective Board meeting.	read with BSE Circular DCS/COMP/28/2016-17 March 30, 2017	have been uploaded beyond 30 minutes reckoned from the conclusion of respective Board meeting					period under review	

Assumptions & Limitation of scope and Review:

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.

2. My responsibility is to certify based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.