



**Mundhara & Co.,**

**COMPANY SECRETARIES**

**JAGDISH P MUNDHARA, B.Com (Hons.), FCS**

**C1, Roop Chamber, 3<sup>rd</sup> Floor,  
No. 43, Erulappan Street, Sowcarpet,  
Chennai – 600 079.**

**Tel: 044 – 2536 8835**

**Email ID: mundhara\_co@yahoo.co.in**

30.05.2023

To,  
The Board of Directors,  
M/s. MEENAKSHI (INDIA) LIMITED  
New No. 29/16, Whites Road, IV Floor,  
Royapettah,  
Chennai – 600 014.

Dear Sir,

**Sub: Annual Secretarial Compliance Report for the financial year 2022-23  
(year ended on March 31, 2023)**


We have been engaged by M/s. MEENAKSHI (INDIA) LIMITED ("the Company") (CIN: L74300TN1987PLC014678) whose equity shares are listed on The Calcutta Stock Exchange Limited (CSE) to conduct an audit in terms of Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended from time to time and read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019 to issue the Annual Secretarial Compliance Report thereon for the financial year 2022-23 (year ended on March 31, 2023).

It is the responsibility of the management of the Company to maintain records, devise proper systems to ensure compliance with the provisions of all the 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. 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.

Our audit was conducted in accordance with the Guidance Note on Annual Secretarial Compliance Report issued by the Institute of Company Secretaries of India and in a manner which involved such examinations and verifications as considered necessary and adequate for the said purpose. The required Annual Secretarial Compliance Report is enclosed with this letter.

Please acknowledge the receipt and do the needful.

Thanking you,  
Yours faithfully,  
For MUNDHARA & CO,  
Company Secretaries  
(ICSI Unique Code: S1988TN005000)  
Peer Review Certificate No: 2155/2022

  
(JAGDISH P MUNDHARA)  
Proprietor  
FCS 2353 C.P. NO. 1443





**Secretarial Compliance Report of MEENAKSHI (INDIA) LIMITED  
for the year ended March 31, 2023**

To,  
The Board of Directors,  
M/s. MEENAKSHI (INDIA) LIMITED  
New No. 29/16, Whites Road, IV Floor,  
Royapettah,  
Chennai – 600 014.

We have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by M/s. MEENAKSHI (INDIA) LIMITED (hereinafter referred as 'the listed entity'), having its Registered Office at New No. 29/16, Whites Road, IV Floor, Royapettah, Chennai – 600 014. Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts / statutory compliances and to provide our observations thereon.

Based on our 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, we hereby report that the listed entity has, during the review period covering the financial year ended on March 31, 2023 complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter :

We have examined:

- all the documents and records made available to us and explanation provided by M/s. MEENAKSHI (INDIA) LIMITED ("the listed entity");
- the filings / submissions made by the listed entity to the stock exchanges;
- website of the listed entity; and
- 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:

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

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 and amendments from time to time;
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 (*Not applicable to the Company during the review period*);
- Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 (*Not applicable to the Company during the review period*);
- Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 (*Not applicable to the Company during the review period*);
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018; and circulars/guidelines issued thereunder; and
- Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021; and circulars/guidelines issued thereunder.

and based on the above examination, We hereby report that, during the Review Period:

- I. 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
Refer Annexure-1 attached to this report.										

- 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-2 attached to this report.										

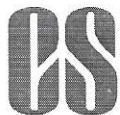




II. Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18<sup>th</sup> October, 2019:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks by PCS*
1.	<b>Compliances with the following conditions while appointing / re-appointing an auditor</b>		
	<p>i. If the auditor has resigned within 45 days from the end of a quarter of a financial year, the audit or 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 audit or 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>	Not Applicable	There has been no change in the office of the statutory auditors of the Company.
2.	<b>Other conditions relating to resignation of statutory auditor</b>		
	<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>	Not Applicable	There has been no change in the office of the statutory auditors of the Company.





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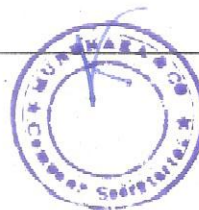
	<p>b. In case the audit or proposes to resign, all concerns with respect to the proposed resignation, along with relevant documents has been brought to the notice of the Audit Committee. In cases where the proposed resignation is due to non-receipt of information / explanation from the company, the auditor 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 audit or 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 18th October, 2019.	Not Applicable	There has been no change in the office of the statutory auditors of the Company.





III. We 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.	<b>Secretarial Standards:</b> 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	The Company has duly complied with the Secretarial Standards issued by the Institute of Company Secretaries India (ICSI).
2.	<b>Adoption and timely updation of the Policies:</b> <ul style="list-style-type: none"><li>All applicable policies under SEBI Regulations are adopted with the approval of Board of Directors of the listed entities</li><li>All the policies are in conformity with SEBI Regulations and have been reviewed &amp; updated on time, as per the regulations / circulars / guidelines issued by SEBI</li></ul>	Yes  Yes	The Company has adopted and updated the applicable policies. However, the same are not uploaded on the website of the Company.
3.	<b>Maintenance and disclosures on Website:</b> <ul style="list-style-type: none"><li>The Listed entity is maintaining a functional website</li><li>Timely dissemination of the documents/information under a separate section on the website</li><li>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</li></ul>	Yes  No  No	The Company has not updated its website with regard to various matters which are statutorily required to be placed on the website of the Company.
4.	<b>Disqualification of Directors:</b> None of the Director(s) of the Company is / are disqualified under Section 164 of the Companies Act, 2013 as confirmed by the listed entity.	Yes	None of the Directors of the Company are disqualified under Section 164 of Companies Act, 2013.
5.	<b>To examine details related to Subsidiaries of listed entities:</b> a) Identification of material subsidiary Companies b) Disclosure requirement of material as well as other subsidiaries	Not Applicable	The Company does not have any Subsidiary Companies. However, the Company has one Associate Company, namely, M/s. MIL STEEL AND POWER PRIVATE LIMITED





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6.	<b>Preservation of Documents:</b> 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 for Preservation of Documents and No for Archival Policy	The Company has complied with the SEBI Regulations for preserving and maintaining the prescribed records. However, we are unable to verify the archived documents of the Company as the Company does not have an updated website
7.	<b>Performance Evaluation:</b> 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.	Yes	The Company has duly conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year.
8.	<b>Related Party Transactions:</b> 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.	Yes  Yes	The Company has obtained prior approval of Audit Committee for all Related Party transactions. Further, members approval for all the related party transactions has also been sought by the Company.
9.	<b>Disclosure of events or information:</b> 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.	Yes	As informed by the management, the Company has provided all the disclosures as required under regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.
10.	<b>Prohibition of Insider Trading:</b> The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	No	The Company has not maintained structured digital database as contemplated under Regulation 3(5) & 3(6) of the SEBI (Prohibition of Insider Trading) Regulations, 2015.
11.	<b>Actions taken by SEBI or Stock Exchange(s), if any:</b> 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.	No	As per the web disclosure made by the Calcutta Stock Exchange Limited, the Company is liable to pay a penalty of Rs.301000/- in aggregate in respect of various non-compliances made during the financial year 2021-22.  With reference to various observations on non-submission / delayed submission of disclosures on the website of the Calcutta Stock Exchange and the consequent penalty being reflected on the website, the management has informed that the said website had certain technical





			glitches and accordingly the relevant tabs were not appearing for submission/uploading data. The Company's executives were in constant touch with the authorities about the said issues in the website and upon resolving had thereafter uploaded the required disclosures. The penalties being system driven have not recognized the technical issues and had calculated the same for all days of delay. With regard to the penalties being reflected on the web disclosures of the Calcutta Stock Exchange, the Company is under discussion, submission and negotiation with the Exchange and has requested them to waive the penalties for the said non compliances.
12.	<b>Additional Non - compliances, if any:</b> No additional non-compliance observed for any SEBI Regulation / circular / guidance note etc.	Yes	The other details of non-compliances are provided in Annexure-1 to this report.

#### 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. Our responsibility is to certify based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion;
3. We have not verified the correctness and appropriateness of financial records and books of accounts of the listed entity;





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4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

For MUNDHARA & CO,  
Company Secretaries  
(ICSI Unique Code: S1988TN005000)  
Peer Review Certificate No: 2155/2022

*K. Mundhara*

(JAGDISH P MUNDHARA)  
Proprietor  
FCS 2353 C.P. NO. 1443



UDIN: F002353E000421134

Place: Chennai  
Date : 30.05.2023



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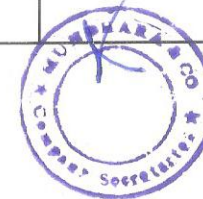
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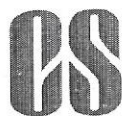
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## Annexure – 1

*(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
01.	The Company was required to submit disclosures on related party transactions within 15 days from the date of publication of its standalone financial results for the half year ended March 31, 2022.	Regulation 23(9) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	The Company has delayed in submitting the disclosure within the stipulated time. The period of delay was 2 days.	The Company has submitted the same on June 15, 2022	No action was taken by the Exchange	The Company was required to submit disclosures on related party transactions within 15 days from the date of publication of its standalone financial results for the half year ended March 31, 2022. The Financial Results were adopted on May 30, 2022, the required disclosure was to be submitted by June 13, 2022 but the same was submitted on June 15, 2022 and hence there has been a delay of 2 days.	Nil	The Company was required to submit disclosures on related party transactions within 15 days from the date of publication of its standalone financial results for the half year ended March 31, 2022. The Financial Results were adopted on May 30, 2022, the required disclosure was to be submitted by June 13, 2022 but the same was submitted on June 15, 2022 and hence there has been a delay of 2 days.	As informed by the management, due to a technical error of the CSE website, the Company encountered difficulties and were unable to upload the document. This unforeseen issue prevented the document from being uploaded on requisite due date and hence were uploaded when the issue of the website got resolved. Upon observing the portal error, CSE has also refrained from imposing any penalty on the same.	Nil





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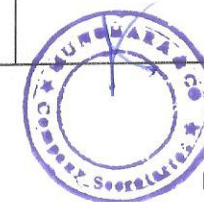
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02.	The Company was required to submit quarterly Compliance Report on Corporate Governance within 21 days from the end of the quarter ended on March 31, 2022.	Regulation 27 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	The Company has delayed in submitting the same within the stipulated time and was submitted on April 22, 2022 thereby a delay of 1 day.	The Company has submitted the same on April 22, 2022	No action was taken by the Exchange	The Company was required to submit quarterly Compliance Report on Corporate Governance within 21 days from the end of the quarter ended on March 31, 2022 and the same was submitted on April 22, 2022 and hence with a delay of 1 day.	Nil	The Company was required to submit quarterly Compliance Report on Corporate Governance within 21 days from the end of the quarter ended on March 31, 2022 and the same was submitted on April 22, 2022 and hence with a delay of 1 day.	As informed by the management, due to a technical error of the CSE website, the company encountered difficulties and were unable to upload the document. This unforeseen issue prevented the document from being uploaded on requisite due date and hence were uploaded when the issue of the website got resolved. Upon observing the portal error, CSE has also refrained from imposing any penalty on the same.	Nil
03.	The listed entity is required to submit to the stock exchange and publish on its website a copy of the annual report sent to the shareholders along with the notice of the annual general meeting not later than the day of commencement of dispatch to its shareholders	Regulation 34 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 – Annual Report.	The Company had dispatched the notice of annual general meeting and annual report to its shareholders and an intimation of this disclosure was published in the Newspapers in the respective issue dated 6th September, 2022 but the Annual Report was submitted to the Exchange on 22nd September, 2022 thereby with a delay of 17 days.	The Company has submitted the same on September 22, 2022	No action was taken by the Exchange	The Company had dispatched the notice of annual general meeting and annual report to its shareholders and an intimation of this disclosure was published in the Newspapers in the respective issue dated 6th September, 2022 but the Annual Report was submitted to the Exchange on 22nd September, 2022 thereby with a delay of 17 days.	Nil	The Company had dispatched the notice of annual general meeting and annual report to its shareholders and an intimation of this disclosure was published in the Newspapers in the respective issue dated 06th September, 2022 but the Annual Report was submitted to the Exchange on 22nd September, 2022 thereby with a delay of 17 days.	As informed by the management, the Company was unable to create the TAB for Regulation 34 for financial year 2021-22 to upload the annual report on the CSE portal due to technical issue and therefore after several communication with the CSE officials, the issue took 17 days to get resolved. This led to delay in submission of Reg 34 (Annual report) by 17 days. Upon observing the portal error, CSE has also refrained from imposing any penalty on the same.	Nil





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04.	The listed entity has to maintain a functional website containing the information about the listed entity.	Regulation 46 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	The Company has not updated its website with regard to various matters which are statutorily required to be placed on the website of the Company.	No action is taken by the Exchange	No action is taken by the Exchange	The Company has not updated its website with regard to various matters which are statutorily required to be placed on the website of the Company.	Nil	The Company has not updated its website with regard to various matters which are statutorily required to be placed on the website of the Company.	The Company has provided all the data to the external technical supporter for the web applications and is expecting the same to be updated shortly.	Nil
05.	The Company is required to maintain a structured digital database containing the names of such persons or entities as with whom information is shared under this regulation along with PAN or any other identifier authorized by law where PAN is not available	Regulation 3 (5) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 – Implementing the Digital Database.	The Company has not maintained Structured digital database as contemplated under regulation 3(5).	No action is taken by the Exchange	No action is taken by the Exchange	The Company has not maintained Structured digital database as contemplated under regulation 3(5).	Nil	The Company has not maintained Structured digital database as contemplated under regulation 3(5).	The Company is in the process of acquiring the said software and are in the process of short-listing the said vendor.	Nil





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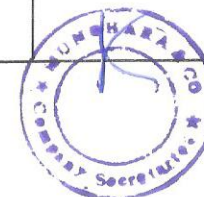
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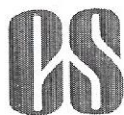
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## Annexure – 2

(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
01.	The Company was required to submit disclosures on related party transactions within 30 days from the date of publication of its standalone financial results for the half year ended September 30, 2021, in the format specified in the relevant accounting standards for annual results to the stock exchanges and publish the same on its website.	Regulation 23(9) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	The Company has not made any such disclosure for the half year ended September 30, 2021.	The Calcutta Stock Exchange Limited (CSE)	Penalty imposed	The Company was required to submit disclosures on related party transactions on a consolidated basis within 30 days from the date of publication of its standalone financial results for the half year ended September 30, 2021.  The Company has not made any such disclosure for the half year ended September 30, 2021.	Rs.210000/-	The Company has not made any such disclosure for the half year ended September 30, 2021.  As per the web disclosure made by the Exchange, the Company is liable to pay a penalty of Rs.210000/- for the said non-compliance.	The Company has classified itself as an exempted Company by virtue of Regulation 15(2) from complying with the provisions of Regulation 23(9) as the paid-up capital of the Company is less than Rs.10 Crores and has submitted the Non-Applicability Certificate in this regard.	Refer Foot Note-1



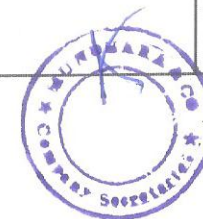


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02.	The listed entity shall submit a quarterly compliance report on corporate governance in the format as specified by the Board from time to time to the recognised stock exchange(s) within twenty one days from the end of each quarter	Regulation 27 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements), 2015 – Other Corporate Governance Requirements.	The Company has not filed the quarterly compliance report on corporate governance and has instead filed the Certificate for non-applicability of Corporate Governance. Further, the said non-applicability certificate was filed with a delay of 108 days in respect of the quarter ended June 30, 2021 and by 17 days in respect of quarter ended September 30, 2021.	The Calcutta Stock Exchange Limited (CSE)	Penalty imposed	The Company has not filed the quarterly compliance report on corporate governance and has instead filed the Certificate for non-applicability of Corporate Governance. Further, the said non-applicability certificate was filed with a delay of 108 days in respect of the quarter ended June 30, 2021 and by 17 days in respect of quarter ended September 30, 2021.	Rs.32000/-	The Company has not filed the quarterly compliance report on corporate governance and has instead filed the Certificate for non-applicability of Corporate Governance. Further, the said non-applicability certificate was filed with a delay of 108 days in respect of the quarter ended June 30, 2021 and by 17 days in respect of quarter ended September 30, 2021.  As per the web disclosure made by the Exchange, the Company is liable to pay a penalty of Rs.32000/- for the said non-compliance made in respect of quarter ended September 30, 2021.	The Company has classified itself as an exempted Company by virtue of Regulation 15(2) from complying with the provisions of Regulation 27 as the paid-up capital of the Company is less than Rs.10 Crores and has submitted the Non-Applicability Certificate in this regard.	Refer Foot Note-1
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COMPANY SECRETARIES

JAGDISH P MUNDHARA, B.Com (Hons.), FCS

C1, Roop Chamber, 3<sup>rd</sup> Floor,  
No. 43, Erulappan Street, Sowcarpet,  
Chennai – 600 079.

Tel: 044 – 2536 8835

Email ID: mundhara\_co@yahoo.co.in

03.	The listed entity shall give prior intimation to stock exchange about the meeting of the board of directors in which any of the following proposals is due to be considered:  (a) financial results viz. quarterly, half yearly, or annual, as the case may be atleast five days in advance (excluding the date of the intimation and date of the meeting)	Regulation 29 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 - Prior Intimations	The listed entity shall give prior intimation to stock exchange about the meeting of the board of directors in which any of the following proposals is due to be considered:  (a) financial results viz. quarterly, half yearly, or annual, as the case may be atleast five days in advance (excluding the date of the intimation and date of the meeting)	No action is taken by the Exchange	No action is taken by the Exchange	The Company has not made prior intimation in respect of the Board Meeting held on June 30, 2021 where the annual financial results for the year ended March 31, 2021 were considered.	Nil	The Company has not made prior intimation in respect of the Board Meeting held on June 30, 2021 where the annual financial results for the year ended March 31, 2021 were considered.	Due to inadvertence, the Company has missed to file a prior intimation of the Board Meeting held on June 30, 2021.	Nil
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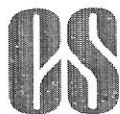
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04.	The listed entity shall submit the financial results in the following manner:  (a) The listed entity shall submit annual audited standalone financial results to the stock exchange within sixty days of end of last quarter (extended to 90 days during previous year due to COVID-19).	Regulation 33 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements), 2015 - Financial Results.	The listed entity has failed to submit the financial results in the following manner: (a) The listed entity shall submit annual audited standalone financial results to the stock exchange within sixty days of end of last quarter	The Calcutta Stock Exchange Limited (CSE)	Penalty imposed	The Company has filed the said results with a delay of 1 day for the quarter and year ended March 31, 2021.	Rs.5000/-	The Company has filed the said results with a delay of 1 day for the quarter and year ended March 31, 2021.  As per the web disclosure made by the Exchange, the Company is liable to pay a penalty of Rs.5000/- for the said non-compliance.	Refer Foot Note-1	Refer Foot Note-1
05.	The listed entity shall submit to the stock exchange and publish on its website- (a) a copy of the annual report sent to the shareholders along with the notice of the annual general meeting not later	Regulation 34 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements),	The Company has filed the said Annual Report with a delay for the year ended March 31, 2021.	The Calcutta Stock Exchange Limited (CSE)	Penalty imposed	The Company has filed the said Annual Report with a delay for the year ended March 31, 2021.	Rs.54000/-	The Company has filed the said Annual Report with a delay for the year ended March 31, 2021.  As per the web disclosure made by the Exchange, the Company is liable to pay a penalty of Rs.54000/- for the said non-compliance.	Refer Foot Note-1	Refer Foot Note-1



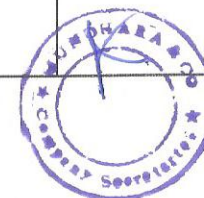


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	than the day of commencement of dispatch to its shareholders	2015 - Annual Report.								
06.	The listed entity has to maintain a functional website containing the information about the listed entity	Regulation 46 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 - Disclosure in the website of the Company	The Company has not updated its website with regard to various matters which are statutorily required to be placed on the website of the Company.	No action is taken by the Exchange	No action is taken by the Exchange	The Company has not updated its website with regard to various matters which are statutorily required to be placed on the website of the Company.	Nil	The Company has not updated its website with regard to various matters which are statutorily required to be placed on the website of the Company.	The Company has provided all the data to the external technical supporter for the web applications and is expecting the same to be updated shortly.	Nil
07.	The Company is required to upload/intimate about the receipt of disclosures under Regulation 30(1) and 30(2) of the Securities and Exchange Board of India	Regulation 30(1) and 30(2) of the Securities and Exchange Board of India (Substantial Acquisition	As per the online records maintained by the Calcutta Stock Exchange Limited, the said disclosures are not appearing in the Company's records.	No action is taken by the Exchange	No action is taken by the Exchange	As per the online records maintained by the Calcutta Stock Exchange Limited, the said disclosures are not appearing in the Company's	Nil	As per the online records maintained by the Calcutta Stock Exchange Limited, the said disclosures are not appearing in the Company's records.	Due to inadvertence, the Company has missed to submit such disclosures.	Nil





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	(Substantial Acquisition of Shares and Takeovers) Regulations, 2011 to the exchange within 7 working days from the end of each financial year.	of Shares and Takeovers) Regulations, 2011 – Continual Disclosures.				records.				
08.	The promoters of the Company are required to convert all their share holdings in the Company in the demat mode.	Circular on Shareholding of promoter / promoter group to be in dematerialized mode	The promoters of the Company are required to convert all their share holdings in the Company in the demat mode.	No action is taken by the Exchange	No action is taken by the Exchange	The promoters of the Company are yet to dematerialize all their share holdings in the Company in the demat mode.	Nil	The promoters of the Company are yet to dematerialize all their share holdings in the Company in the demat mode.	As informed by the management, the said dematerialization of promoter holdings is under process.	During the financial year 2022-23, the said demat process was completed. All the holdings of promoters are now in demat mode.

Note-1: With reference to various observations on non-submission / delayed submission of disclosures on the website of the Calcutta Stock Exchange and the consequent penalty being reflected on the website, the management has informed that the said website had certain technical glitches and accordingly the relevant tabs were not appearing for submission/uploading data. The Company's executives were in constant touch with the authorities about the said issues in the website and upon resolving had thereafter uploaded the required disclosures. The penalties being system driven have not recognized the technical issues and had calculated the same for all days of delay. With regard to the penalties being reflected on the web disclosures of the Calcutta Stock Exchange, the Company is under discussion, submission and negotiation with the Exchange and has requested them to waive the penalties for the said non compliances.

