



30th May, 2022

To,

Listing Department BSE Limited Phiroze Jeejeebhoy Towers, Dalal Street Mumbai-400 001. Scrip Code: 511389	Listing Department The National Stock Exchange of India Ltd. Exchange Plaza, Bandra-Kurla Complex, Bandra East, Mumbai - 400 051. NSE Symbol: VIDEOIND
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Subject: Disclosure- Compliance under Regulation 24(A) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Ref: Videocon Industries Limited (the "Company")

Dear Sir/ Ma'am,

In terms of Regulation 24(A) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019, we are forwarding herewith Annual Secretarial Compliance Report of the Company, duly issued by Sudhanya Sengupta, Practising Company Secretary (CP 7756) for the financial year ended 31st March, 2022.

Kindly take the same on record.

Thanking you,

Yours truly,

For **VIDEOCON INDUSTRIES LIMITED**

(A Company under Corporate Insolvency Resolution Process by NCLT order dated 6th June, 2018 and order dated 08th August, 2019 read with order dated 25th September, 2019)

SAMRIDHI KUMARI
COMPANY SECRETARY AND COMPLIANCE OFFICER
MEMBERSHIP NO.: A54714

CC:

Singapore Stock Exchange
2 Shenton Way,
19- 00, SGX Centre 1,
Singapore 068804

VIDEOCON INDUSTRIES LIMITED

Correspondence Address	Registered Office	New Delhi	Office	Project Office (Oil & Gas)
171 Mittal Court, 'C' wing, 17 th Floor, Nariman Point, Mumbai – 400012, India T (+91-22) 6611 3500	14KM Stone, Aurangabad-Paithan Road, Village Chittegaon, Taluka Paithan, District Aurangabad – 431 105 India T (+91 - 2431) 251501 – 2 F (+91 - 2431) 251501 www.videoconworld.com	Videocon Tower, 12 th Floor, Rani Jansi Marg, E-1 Jhandewala Extn, New Delhi – 110055 India T (+91-11) 4159 3100 F (+91-11) 41593150/ 23616593 CIN:L99999MH1986PLC106324		42, Thirumal Pillai Road, 1 st Floor, T. Nagar, Chennai – 600 017 India T (+91-44) 2834 3180 F (+91-44) 2834 0950

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Annual Secretarial Compliance Report of Videocon Industries Limited ("the Company") for the year ended 31.03.2022 pursuant to Reg 24 A of Securities and Exchange Board of India

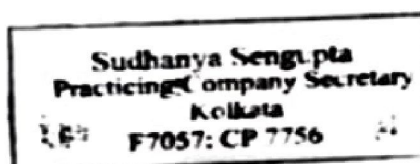
(Listing Obligations and Disclosure Requirements) Regulations, 2015

The Hon'ble National Company Law Tribunal, Mumbai Bench, ("NCLT"), had vide its order dated June 06, 2018 admitted the application for the initiation of the corporate insolvency resolution process ("CIRP") of Corporate Debtor ("**Admission Order**") in terms of the Insolvency and Bankruptcy Code, 2016 read with the rules and regulations framed thereunder, as amended from time to time ("**IBC Code**"). Subsequently, the Hon'ble NCLT vide its order dated August 08, 2019 ("**Consolidation Order**") has ordered the consolidation of the CIRP of the 13 Videocon Group entities, including the Corporate Debtor, ("**Videocon Group Entities**"). Further, the NCLT vide an order dated September 25, 2019 has appointed Mr. Abhijit Guhathakurta as the resolution professional ("**Resolution Professional**") for the consolidated CIRP of the Videocon Group Entities including the Corporate Debtor ("**Appointment Order**"). The Appointment Order was published on September 27, 2019, on which date the Resolution Professional has taken over the management and affairs of the Videocon Group Entities. Pursuant to the publication of the Appointment Order and in accordance with the provisions of the Code, the powers of the Board of Directors of the Company stand suspended and the same have been vested with and are being exercised by the Resolution Professional. Further, NCLT vide order dated June 08, 2021 ("**Approval Order**"), approved the resolution plan submitted by Twin Star Technologies Limited ("**Approved Plan**").

In terms of the Approved Plan, a steering committee of the Company had been constituted ("**Steering Committee**"). The Steering Committee in its meeting held on June 18, 2021 had appointed the Resolution Professional, Mr. Abhijit Guhathakurta, as the interim manager of the Corporate Debtors ("**Interim Manager**"), for undertaking the management and control the Company, from the date of Approval Order till the completion of the implementation process on the Closing Date (as provided under the Approved Plan).

However, pursuant to the appeals filed by the Bank of Maharashtra and IFCI Limited before the Hon'ble National Company Law Appellate Tribunal, New Delhi (the "NCLAT"), the Hon'ble NCLAT, vide its order dated July 19, 2021 in the said Appeals (the "**Stay Order**"), inter-alia stayed the operation of the NCLT Approval Order till the next date of hearing and ordered the maintenance of status quo ante as before passing of the NCLT Approval Order. Further, as per the Stay Order, the Resolution Professional had been directed to continue to manage the 13 Videocon Group Entities as per the provisions of the Code till the next date of hearing.

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Later on, the NCLAT vide its final order dated January 05, 2022 set aside the Approval Order and remitted back the matter to the Committee of Creditors (the "COC") for completion of the process relating to CIRP in accordance with the provisions of the Code (the, "NCLAT Final Order"). Subsequently, pursuant to the NCLAT Final Order, the COC in their meeting held on January 12, 2022, decided to invite fresh expressions of interest for submission of resolution plan for Consolidated Corporate Debtors in accordance with IBC and CIRP Regulations.

Based on the information furnished to me by the Company and its representatives, I have been informed that Twin Star Technologies Limited challenged the NCLAT Final Order in Civil Appeals bearing numbers 509, 512 and 894 of 2022 before the Hon'ble Supreme Court ("SC Appeals"). The SC Appeals were listed on February 14, 2022, on which date, the Hon'ble Supreme Court made certain oral remark to the Resolution Professional and COC to not proceed further with the CIRP of the Consolidated Corporate Debtors till any orders in subsequent hearings

I, Sudhanya Sengupta, Practicing Company Secretary, have examined:

- all the documents and records made available to me and explanation provided by the officials of Videocon Industries Limited, CIN L99999MH1986PLC103624 (hereinafter referred to as "the listed entity")
- the filings/submissions made by the listed entity to the stock exchanges
- website of the listed entity
- any other document/filing, as may be relevant, which has been relied upon to make this certification.

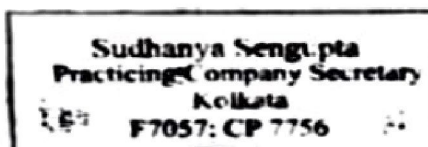
For the year ended 31st March 2022(hereinafter referred to as "Review Period") in respect of compliance with the provisions of

- the Securities and Exchange Board of India Act, 1922 ("SEBI Act") and the Regulations, Circulars, Guidelines issued thereunder; and
- the Securities Contracts (Regulation) Act, 1956 ('SCRA') and the 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;

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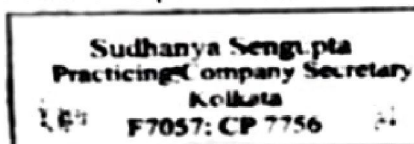
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- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; *(Not applicable during the review period)*
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; *(Not applicable during the review period)*
- Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; *(Not applicable during the review period)*
- Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; *(Not applicable during the review period)*
- Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013; *(Not applicable during the review period)*
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- The Securities and Exchange Board of India (Registrar to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;
- The Securities and Exchange Board of India (Depositories and Participants Regulations), 1996 and 2018; and
- Other regulations as applicable and circulars/ guidelines issued thereunder

It may be noted that as per the provisions of IBC and provisions of Regulation 15 (2A) and (2B) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations 2015 (SEBI (LODR)) as amended from time to time, the provisions specified in regulation 17, 18, 19, 20, 21 shall not be applicable during the CIRP. The provisions as specified in said regulations of the SEBI (LODR) shall not be applicable during the CIRP and the roles and responsibilities of the board of directors and the

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committees, specified in the respective regulations, shall be fulfilled by the interim resolution professional or resolution professional, as the case may be.

Based on the above and the examination carried out by me, I hereby report that for the purpose of this report all stock exchange filings/submissions/publications made during the period commencing 1st April, 2021 upto 31st March, 2022, have been taken into consideration and that during the said Review Period;

(a)The listed entity has complied with the provisions of the SEBI Regulations and circulars/guidelines issued thereunder, except in respect of matters specified below:

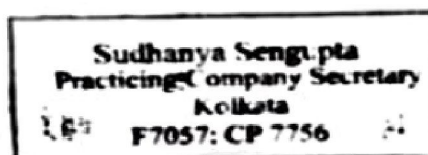
Sr. No	Compliance Requirement (Regulations/circulars/guidelines including specific clause	Deviations	Observations/Remarks of the Practicing Company Secretary
1	Regulation 14 of Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 with regards to Payment of Listing Fees to the recognized stock exchanges in the manner specified by the Exchange(s).	The Company has not paid Listing fee to the recognized stock exchanges where the shares of the Company are listed.	<i>The Company has violated with the provisions of Regulation 14 of SEBI (LODR) Regulation, 2015 with reference to timely payment of listing fees.</i>
2	Regulation 23 (9) of Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 with regards to disclosure of material Related Party Transactions within 30 days of publication of financial results	The Company has failed in submission/filing of disclosure on Related Party Transactions under Regulation 23(9) of SEBI LODR with both BSE/NSE for the year ended on 31 st	<i>The Company has violated the provision of Regulation 23(9) of SEBI (LODR) Regulation, 2015 w.r.t. disclosures of related party transactions.</i>

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Sudhanya Sengupta
Practicing Company Secretary
Kolkata
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		March, 2021 and half-year ended on 30 th September, 2021.	
3	Regulation 24A of Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and SEBI Circular SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019 with regards to Annual Secretarial Compliance Report to be submitted by listed entities within 60 days of the Financial year ended.	The Company has not submitted the Annual Secretarial Compliance report to the stock exchange(s) for financial year ended 31st March 2021	<i>The Company has not filed the Annual Secretarial Compliance Report under Regulation 24A for financial year ended 31st March, 2021.</i> <i>However, the Company has informed that it is in the process of filing the same with the Stock Exchanges.</i>
5	Regulation 31 of Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 with regards to Submission of Shareholding Pattern separately for each class of securities within 21 days of each quarter ended of the financial year	The Company has not filed the Shareholding Pattern for the quarter ended 31st March 2021, 30th June, 2021, 30th September, 2021 and 31st December, 2021 with both the exchanges.	<i>The Company has not complied with provisions of Regulations 31 of Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 with regards to Submission of Shareholding Patterns for 31st March 2021, 30th June, 2021, 30th September, 2021 and 31st</i>

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December, 2021 with both the exchanges.

The Company has informed that the non-compliance under Regulation 31 of SEBI (LODR) Regulation, 2015 has incurred on the Company due to the non-availability of the Beneficiary position (Benpos) data from Central Depository Services Limited ("CDSL").

**The Company has further informed that:*

- A. the said non-compliance is due to the outstanding Pre-CIRP Dues of CDSL,*
- B. CDSL has refused to provide the Benpos data from time to time on the ground of outstanding Pre-CIRP Dues.*
- C. As per the Insolvency and Bankruptcy Code, 2016, there is limitation on the companies to clear the outstanding dues of Pre-CIRP, considering such*

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			<p><i>provisions of Insolvency and Bankruptcy Code, the Company could not make the payment to CDSL.</i></p> <p><i>D. Further, CDSL has also filed the claim in respect of said Pre-CIRP Dues and the same was admitted by the Resolution Professional in CIRP of Videocon Group Entities. Even after that, CDSL has refused to release the BENPOS to the Company from time to time. Due to this, the Company was unable to comply with submission of shareholding pattern with the stock exchanges from the quarter ended March 31, 2021 till December 31, 2021.</i></p>
6	Regulation 33 of Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 with regards to submission of quarterly and year to date standalone financial results, quarterly consolidated	The Company has not submitted the Unaudited Financial Results for the Quarter ended 31 st March, 2021, 30 th	With Reference to Regulation 33 of SEBI (LODR) Regulation, 2015, the company has not published the financial results for various

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	and year to date financial results within 45 days and 60 days respectively from end of each quarter	June, 2021, 30 th September, 2021 and 31 st December, 2021 with both BSE/NSE.	<p>quarters. Thus, the Company has violated the provisions of regulation 33 of SEBI (LODR) Regulations, 2015 .</p> <p>However, with reference to SEBI Circular CIR /CFD/CMD1/142/2018 dated November 19, 2018 regarding "disclosure of reasons for delay in submission of financial results by the listed entity', the company has submitted to the Stock Exchanges the reasons for the delay in submission of the Financial results for quarter ended from 31st March 2021 to December 2021 with both BSE/NSE.</p>
10	Regulation 76 of Depository Participant Regulations, 2018	The Company has not filed the Reconciliation of Share Capital Audit with Stock Exchanges i.e. BSE and NSE for the Quarter ended 31 st March, 2021, 30 th June, 2021, 30 th September, 2021 and	<p>The Company has violated the provisions of Regulation 76 of Depository Participant Regulations, 2018.</p> <p>The Company has informed that the said non-compliance under provisions of Regulation 76 of Depository Participant</p>

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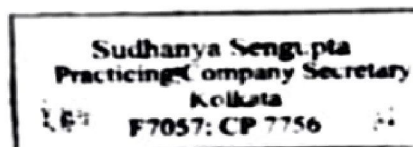
		<p>31st December, 2021 with both BSE/NSE.</p>	<p>Regulations, 2018 incurred on the Company due to the non-availability of the Beneficiary position (Benpos) data from Central Depository Services Limited ("CDSL").</p> <p><i>* The Company has informed that the non-compliance under Regulation 76 of Depository Participant Regulations, 2018 has incurred on the Company due to the non-availability of the Beneficiary position (Benpos) data from Central Depository Services Limited ("CDSL").</i></p> <p><i>*The Company has further informed that:</i></p> <ul style="list-style-type: none"><i>A. the said non-compliance is due to the outstanding Pre-CIRP Dues of CDSL,</i><i>B. CDSL has refused to provide the Benpos data from time to time on the ground of outstanding Pre-CIRP Dues.</i><i>C. As per the Insolvency and Bankruptcy Code,</i>
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			<p>2016, there is limitation on the companies to clear the outstanding dues of Pre-CIRP, considering such provisions of Insolvency and Bankruptcy Code, the Company could not make the payment to CDSL.</p> <p>D. Further, CDSL has also filed the claim in respect of said Pre-CIRP Dues and the same was admitted by the Resolution Professional in CIRP of Videocon Group Entities. Even after that, CDSL has refused to release the BENPOS to the Company from time to time. Due to this, the Company was unable to comply with submission of Share Capital Audit Report with the stock exchanges from the quarter ended March 31, 2021 till December 31, 2021.</p>
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(b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/guidelines issued thereunder in so far as it appears from our examination of those records.

(c) The following are the details of actions taken against the listed entity/ its promoters/directors/ material subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts/Regulations and circulars/guidelines issued thereunder:

While processing the application for delisting submitted with both the Stock Exchanges i.e. Bombay Stock Exchange and National Stock Exchange (Collectively referred as "Stock Exchanges"), the Stock Exchanges informed on the non-compliances to the Company from 2017 to March 2021 and consequently the penalties levied by the Stock Exchanges under the SOP issued by the Securities Exchange Board of India and the same are detailed hereunder:

Sr No	Action Taken by	Details of violation	Details of action taken like fines, warning, debarment etc.	Observations/Remarks of the Practicing Company Secretary, if any
1.	NSE	Regulation 31(Non submission for the quarter ended March 2021)	Fine (INR 59,000/-)	The response given to National Stock Exchange is covered under Serial No. 54
2.	BSE	Reg-13(3) (September-18)	Fine (INR 91,000/-)	The Company has made relevant submission to the Stock Exchanges stating that payments in respect of fines levied by the Stock Exchanges would adversely affect the Corporate Insolvency Resolution Process of the Company and requested to withdraw its demand
3.	BSE	Reg-27(2) (September-18)	Fine (INR 42,000/-)	
4.	BSE	Reg-31 (September-17)	Fine (INR 5,000/-)	
5.	BSE	Reg-31 (March-18)	Fine (INR 34,35,590/-)	
6.	BSE	Reg-31 (June-18)	Fine (INR 1,44,000/-)	
7.	BSE	Reg-31 (September-18)	Fine (INR 1,44,000/-)	
8.	BSE	Reg-31 (September-19)	Fine (INR 6,000/-)	
9.	BSE	Reg-31 (September-20)	Fine (INR 4,76,000/-)	

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10.	BSE	Reg-31 (December-18)	Fine (INR 2,92,000/-)
11.	BSE	Reg-31 (March-21)	Fine (INR 1,10,000/-)
12.	BSE	Reg-33 (June-17)	Fine (INR 36,49,590/-)
13.	BSE	Reg-33 (September-17)	Fine (INR 34,54,590/-)
14.	BSE	Reg-33 (March-18)	Fine (INR 35,79,590/-)
15.	BSE	Reg-33 (September-18)	Fine (INR 70,000/-)
16.	BSE	Reg-33 (March-19)	Fine (INR 9,10,000/-)
17.	BSE	Reg-33 (June-19)	Fine (INR 33,60,000/-)
18.	BSE	Reg-33 (September-19)	Fine (INR 29,00,000/-)
19.	BSE	Reg-33 (December-19)	Fine (INR 24,40,000/-)
20.	BSE	Reg-33 (March-20)	Fine (INR 16,00,000/-)
21.	BSE	Reg-33 (June-20)	Fine (INR 13,70,000/-)
22.	BSE	Reg-33 (September-20)	Fine (INR 10,55,000/-)
23.	BSE	Reg-33 (December-20)	Fine (INR 6,05,000/-)
24.	BSE	Reg-34 (March-17)	Fine (INR 18,000/-)
25.	BSE	Reg-34 (March-20)	Fine (INR 58,000/-)
26.	BSE	Reg-29(2) & 29(3) (December-19)	Fine (INR 10,000/-)
27.	BSE	Reg-6(1) (September-20)	Fine (INR 92,000/-)
28.	BSE	Reg-6(1) (December-20)	Fine (INR 92,000/-)
29.	BSE	Reg-7(1) (September-20)	Fine (INR 92,000/-)
30.	BSE	Reg-7(1) (December-20)	Fine (INR 92,000/-)

for penalties and waive off such penalties.

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31.	NSE	Reg-33 (June-17)	Fine (INR 36,84,589/-)
32.	NSE	Reg-31 (June-18)	Fine (INR 1,46,000/-)
33.	NSE	Reg-33 (June-19)	Fine (INR 33,60,000/-)
34.	NSE	Reg-33 (June-20)	Fine (INR 13,70,000/-)
35.	NSE	Reg-33 (September-17)	Fine (INR 34,59,589/-)
36.	NSE	Reg-31 (September-17)	Fine (INR 5,000/-)
37.	NSE	Reg-33 (September-18)	Fine (INR 70,000/-)
38.	NSE	Reg-27(2) (September-18)	Fine (INR 38,000/-)
39.	NSE	Reg-13(3) (September-18)	Fine (INR 91,000/-)
40.	NSE	Reg-31 (September-18)	Fine (INR 1,42,000/-)
41.	NSE	Reg-33 (September-19)	Fine (INR 29,00,000/-)
42.	NSE	Reg-31 (September-19)	Fine (INR 6,000/-)
43.	NSE	Reg-33 (September-20)	Fine (INR 10,55,000/-)
44.	NSE	Reg-31 (September-20)	Fine (INR 4,76,000/-)
45.	NSE	Reg-33 (December-19)	Fine (INR 24,40,000/-)
46.	NSE	Reg-33 (December-20)	Fine (INR 6,05,000/-)
47.	NSE	Reg-31 (December-20)	Fine (INR 2,92,000/-)
48.	NSE	Reg-34 (March-17)	Fine (INR 2,44,000/-)
49.	NSE	Reg-31 (March-18)	Fine (INR 34,43,589/-)
50.	NSE	Reg-33 (March-18)	Fine (INR 35,84,589/-)
51.	NSE	Reg-33 (March-19)	Fine (INR 9,50,000/-)
52.	NSE	Reg-34 (March-20)	Fine (INR 3,76,000/-)

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53.	NSE	Reg-33 (March-20)	Fine (INR 16,00,000/-)
54.	NSE	Reg-31 (March-21)	Fine (INR 1,10,000/-)

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

The Company has not filed/submitted the Annual Secretarial Compliance report to the stock exchange for financial year ended 31st March 2021 in terms of Regulation 24A of Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February 2019. Hence reporting on actions to comply with the observations in the Annual Secretarial Compliance Report for the previous year does not arise.

Further, the the actions taken by the Company and the Comments of the practicing Company Secretary in respect of outstanding compliances/Observations of the previous reports of the financial year ended on March 31st, 2019 and March 31st, 2020 is listed below:

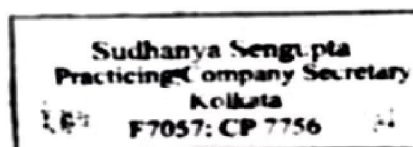
Sr No	Regulation Name/ SEBI Circular number*	Observations of the practicing Company secretary in the previous reports	Observations made in the secretarial compliance report for the year ended.(the years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the practicing company secretary on the actions taken by the listed entity.
From the Secretarial Compliance Report of financial Year 2020					
1.	Regulation 14 of Securities Exchange Board of India (Listing Obligations and the Disclosure	The Company has violated with the provisions of Regulation 14 of	The Company has violated with the provisions of Regulations 14	The Company has not the paid the Annual Listing fees of Bombay Stock	The Company has still not complied.

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	Requirements) Regulations, 2015 with regards to Payment of Listing Fees to the recognized stock exchanges in the manner specified by the Exchanges.	SEBI (LODR) Regulation, 2015	of SEBI (LODR), Regulations, 2015.	Exchanges and Nation Stock Exchanges of financial year 2019-20.	
2.	Regulation 23(9) of Securities Exchange Board of India (Listing Obligations and Disclosure Requirements), 2015 with regards to disclosure on Related Party Transaction within 30 days of publication of financial Results.	The Company has failed in the submission/filing of disclosure on Related Party Transaction for the half-year ended on 30 th September, 2019 and 31 st March, 2019 of its standalone and consolidated financial results under Regulation 23(9) of SEBI (LODR), 2015	The Company has violated the provisions of Regulations 23(9) of SEBI (LODR), 2015 w.r.t disclosure on Related Party Transaction	Due to the non-finalisation of the standalone and consolidated financial results within the due time-frame, the Company was not in position of submitting/filing the disclosure on Related Party Transaction for the half-year ended on 31 st March 2019 and 30 th September, 2019.	The Company has still not complied.

Sengupta



3.	<p>Regulation 24A of Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and SEBI Circular SEBI Circular No.CIR/CFD/CMDI/27/2019 dated 8th February, 2019 with regards to Annual Secretarial Compliance Report to be submitted by listed entities within 60 days of Financial Results.</p>	<p>The Company has not submitted the Annual Secretarial Compliance report to the stock exchange for the financial year ended 31st March, 2019.</p>	<p>The Company has defaulted with the filing of Annual Secretarial Compliance Report under Regulation 24A. However, the Company is in process of filing the same.</p>	<p>The Company has filed the Annual Secretarial Compliance Report under Regulation 24A in the Financial year 2019-20.</p>	<p>The Company has submitted the Annual Secretarial Compliance report to the stock exchange for the financial year ended 31st March, 2019.</p>
4.	<p>Regulation 33 of Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 with regards to submission of</p>	<p>The Company has failed to submit un-audited financial results for the quarter ended on March 2019, June 2019, September 2019 and the December 2019 and the year</p>	<p>With refrence to Regulation 33 of SEBI (LODR), the Company has not published the financial results for various quarters.</p>	<p>The Company is yet to file the Quarterly and year to date standalone financial results and, consolidated financial results for the period</p>	<p>The Company has still not complied.</p>

Sengupta

Sudhanya Sengupta
Practicing Company Secretary
Kolkata
F7057: CP 7756

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COMPANY SECRETARY IN PRACTICE
Peer Review Board Empaneled

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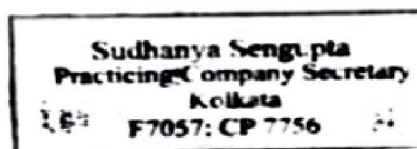
<p>Quarterly and year to date standalone financial results and, consolidated financial results within 45 days and 60 days respectively from the end of each quarter.</p>	<p>to date financial results for March ended ender 2019.</p>	<p>However, with reference to SEBI Circulars CIR/CFD/CMD-1/142/2018 dated November 19, 2018 regarding "disclosure of reason for delay in submission of financial results, by the listed entity the Company has submitted to the stock exchanges the reason for the delay in submission of the financial results for the quarter ended on March 2019, June 2019, September, 2019 and December 2019.</p>	<p>starting from June 2019 to December 2019.</p>	
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Kolkata
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			However, the financial results (standalone and consolidated) for March 31, 2019 was published during the financial year 2019-20.		
5.	<p>Regulation 33(3)(d) of Securities Exchange Board of India (Listing Obligations and Disclosure Requirements)</p> <p>Regulations, 2015 with regards to submission of Audited financial results along with the Audit Report within 60 days from the end of financial year.</p>	<p>The Company has delayed publication of audited standalone financial result for the financial year ended on 31st March, 2019; and publication of audited consolidated financial results for the financial year ended on 31st March, 2019, together with applicable reports, in terms of provision of Regulation 33(3) of the SEBI LODR.</p>	<p>The Company has violated the provisions of the said regulation.</p> <p>However, with the reference to SEBI Circular CIR/CFD/CMD-1/142/2018 dated November 19, 2018 regarding "disclosure of reason for delay in submission of financial results, the Company has submitted to the Stock</p>	<p>The company has informed that only continuing non-compliances can be acted upon. As this compliance is a pre-event based, the same is not a continuing non-compliance and, accordingly, not acted upon</p>	<p>The response of the Company is self-explanatory.</p>

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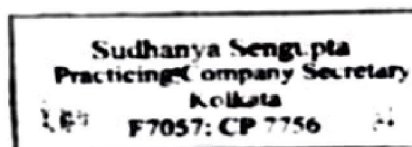
			<p>Exchanges the reason for the delay in submission of the financial results.</p> <p>Therefore, in compliance with the provisions of Regulation 47(3) of SEBI (LODR) Regulation, 2015 with regards to newspaper publication of financial results, the standalone & consolidated financial results for March 31, 2019 was published in the newspaper during the financial year 2019-20.</p>		
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Sengupta

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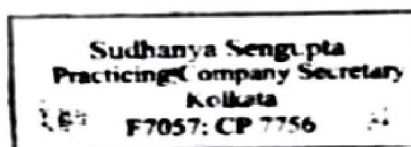
6.	Regulation 47 (1)(a) of Securities Exchange Board of India (Listing Obligations and Disclosure Requirements), 2015 with regards publishing the notice of board meeting where the financial results shall be discussed	The Company has not made any publication of notice of Board meeting held on 3rd December, 2019 for consideration consolidated financial results for the year ended 31st March, 2019.	The Company has violated the provisions of Regulation 47(1)(a) of SEBI (LODR), 2015.	The company has informed that only continuing non-compliances can be acted upon. As this compliance is a pre-event based, the same is not a continuing non-compliance and, accordingly, not acted upon.	The response of the Company is self-explanatory.
From the Secretarial Compliance Report of financial Year 2019					
1.	Regulation 14 of Securities Exchange Board of India (Listing Obligations and Disclosure Requirements), 2015 with regards to Payment of Listing Fees to the recognized stock exchanges in the manner specified by the Exchange(s).	The Company has not paid the Listing fee to the recognized stock exchanges i.e. BSE and NSE for the FY 2018- 19 where the shares of the Company are listed.	The Company has violated the provisions of Regulation, 14 of SEBI (LODR), 2015.	The Company has not the paid the Annual Listing fees of Bombay Stock Exchanges and Nation Stock Exchanges of financial year 2018-19	The Company has still not complied.

Sengupta



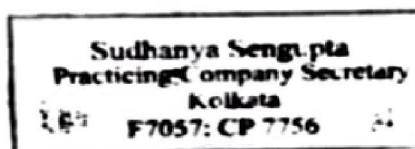
2.	Regulation 7(3) and 40(9) of Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 with regards to half-yearly compliances for the March, 2018 and September, 2018 to be submitted to Stock Exchanges	<p>The Company has failed to submit:</p> <p>1) The Compliance Certificate under Regulation 7(3) of SEBI LODR Regulation, 2015.</p> <p>2) The Certificate under Regulation 40(9) to be procured from the PCS that all share certificates have been issued within 30 days of lodgement of transfer, sub-division, consolidation, renewal, or exchange.</p>	The Company has violated the provisions of Regulation 7(3) and 40(9) of Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	The Company has not complied with the Regulation 7(3) and 40(9) of Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 with regards to half-yearly compliances for the March, 2018 and September, 2018.	The Company has still not complied.
3.	Regulation 29 (2) of Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 with regards to Prior	The Company has failed in giving prior intimation to the stock exchange for Board Meeting held on May 23 2018.	The Company has violated the requirement of giving two days prior intimation to the Stock Exchange in	The company has informed that only continuing non-compliances can be acted upon. As this compliance is a	The response of the Company is self-explanatory..

Sengupta



	intimation to stock exchanges about the Board Meetings.		respect of Board Meeting held on May 23, 2018 in terms of Regulation of Regulation 29(2) of SEBI (LODR), 2018	pre-event based, the same is not a continuing non-compliance and, accordingly, not acted upon.	
4.	Regulation 47 (l)(a) of Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 with regards to publishing the notice of board meeting where the financial results shall be discussed	The Company has not made the publication of notice of Board Meeting during the year for consideration of audited standalone and consolidated financial results for the year ended March 31, 2018.	The Company has violated the provisions of Regulation 47(1)(a) of SEBI (LOD), 2015.	The company has informed that only continuing non-compliances can be acted upon. As this compliance is a pre-event based, the same is not a continuing non-compliance and, accordingly, not acted upon.	The response of the Company is self-explanatory.
5.	Regulation 47 (3) of Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 with regards to publication of Financial Results of the Company in the newspaper within 48	The Company has not made any publication of quarterly financial results in the newspaper during the year 2018-19.	The Company has violated the provisions of Regulations 47(3) of SEBI (LODR), Regulations, 2015.	The company has informed that only continuing non-compliances can be acted upon. As this compliance is a pre-event based, the same is not a	The response of the Company is self-explanatory.

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	hours of the conclusion of Board Meeting.			continuing non-compliance and, accordingly, not acted upon.	
6.	Regulation 76 of Securities Exchange Board of India (Depository and Participant Regulations) 2018 with regards to reconciliation of share capital certification from Practicing Company Secretary within 30 days from each quarter-end of financial year.	The Company has not filed the same for quarter ended September 30, 2018.	The Company has violated Regulation 76 of Securities Exchange Board of India (Depository and Participant Regulations) 2018 for quarter ended September 30, 2018.	The Company is yet to file the reconciliation of share capital certification from Practicing Company Secretary for quarter ended September 30, 2018.	The Company has still not complied.

Place: Kolkata

Date: 27/05/2022

Signature:


Sudhanya Sengupta

Practicing Company Secretary

FCS No: F7057

CP No: 7756

Peer Reviewer Code: 747

UDIN: F007057D000403321

