Corporate Office

315, Rewa Chambers New Marine Lines, Mumbai - 400 020 Tel.: (022) 2201 7389 / 2208 7860 Fax: (022) 2208 4594

Fax: (022) 2208 4594 E-mail: info@sunilgroup.com

www.sunilgroup.com

CIN No.: L99999MH1976PLC019331

Date: 30th May 2023

To,
Department of Corporate Service (DCS-CRD), **BSE Limited.**Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai – 400001

<u>Subject: Submission of Annual Secretarial Compliance Report for the year ended 31st March 2023 under Reg. 24 A of SEBI LODR Regulations, 2015</u>

Ref.: Sunil Industries Limited -BSE code: 521232

Dear Sir,

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015, read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February 2019, we are enclosing herewith the Annual Secretarial Compliance Report of the Company for the year ended 31st March 2023 issued by Mr. Hemant Shetye, Designated Partner of HSPN & Associates LLP, Practicing Company Secretaries.

Request you to take the same on your record and acknowledge.

Yours faithfully,

Yours Faithfully, FOR SUNIL INDUSTRIES LIMITED

Sourab Digitally signed by Sourabh Sahu Date: 2023.05.30 14:50:26 +05'30'

Mr. Sourabh Sahu Company Secretary & Compliance Officer

ACS: 55322

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

206, 2nd Floor, Tantia Jogani Industrial Estate, J. R. Boricha Marg, Opp. Lodha Excelus, Lower Parel (E), Mumbai - 400 011. Tel: 022 23088998/23008998/40026600/40061100

Email: hs@hspnassociates.in Web.: www.hspnassociates.in

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 Sunil Industries 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 Sunil Industries Limited, having its Registered Office at D 8 MIDC Phase II Manpada Road, Dombivli (East) Thane 421201. Secretarial Review was conducted in a manner that provided me a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing my 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 us and explanation provided by BASF India 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:
 - 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: -

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;
- 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;
- 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;
- bisclosure of significant beneficial ownership in the shareholding pattern as per SEBI circular SEBI/HO/CFD/CMD1/CIR/P/2019/36 dated March 12,2019;
- 1) 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;
- E-VOTING Facility as per SEBI Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/242dated December 09, 2020;
- 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;
- 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;
- 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) Disclosureof holding of specified securities and Holding of specified securities in dematerialized form Circular No:SEBI/HO/CFD/PoD-1/P/CIR/2022/92 dated June30,2022
- dd) Circular on use of digital signature certificate for announcements submitted by listed companies Notice No 20220801-24 dated August 01, 2022
- 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;



- 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 No20230209-1 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 asbelow;

Sr. No.	Particulars	Compliance status (Yes/No/NA)	Observations /Remarksby PCS*
1.	Secretarial Standards: The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of	Yes	-
2.	Company Secretaries India (ICSI) Adoption and timely Updation of the Policies:	Yes	_
	 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 		
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.	<u>Disqualification of Director:</u> 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	NA	The Company does not have any subsidiary as of 31st March 2023





	Preservation of Documents:	Yes	-
6.	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.	168	
7.	Performance Evaluation:	Yes	-
	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		
*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, 2015within the time limits prescribed thereunder.	Yes	
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:	V	-
	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		
10		Yes	-
12.	Additional Non-compliances, if any:		
	No any additional non-compliance observed for all SEBI regulation/circular/guidance note etc.		

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 audit process, the auditor has approached the Chairman of the Audit Committee of the listed entity and the Audit Committee shall receive such concern directly and immediately without specifically waiting for the quarterly Audit Committee meetings. b.In case the auditor proposes to resign, all concerns with respect to the proposed resignation, along with relevant documents has 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									
	c. The Audit Committee / Board of Directors, as the case may be, deliberated on the matter on receipt of									



	such information from the auditor relating to the proposal to resign as mentioned above and communicate its views to the management and the auditor.	
	ii.Disclaimer in case of non-receipt of information:	
	The auditor has provided an appropriate disclaimer in its audit report, which is in accordance with the Standards of Auditing as specified by ICAI / NFRA, in case where the listed entity/ its material subsidiary has not provided information as required by the auditor.	
3.	The listed entity / its material subsidiary has obtained information from the Auditor upon resignation, in the format as specified in Annexure- A in SEBI Circular CIR/ CFD/CMD1/114/2019 dated 18th October, 2019.	-

(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 N o.	Compliance Requirement (Regulations/ circulars/guid elines including specific clause)	Regul ation/ Circul ar No.	Deviations	Action Taken by	Type of Action	Details of Violatio n	Fine Amount	ns/Remarks	Manage ment Response	Remarks
1.	Regulation	-	Section of the sectio	.NA	NA	NA	NA	42,300	100000000000000000000000000000000000000	NA
			percent of						Compan	
	Securities and	200	Shareholdi					Thousand	y has	
	_	Securitie	_						demateri	
	Board of India		promoter						alised	
	-	_	group was					Equity shares		
	Obligations and							constituting to	13	
			demateriali					1.71% of the		
	Requirements)								d Seven	
	Regulations,20							*	Hundred	
		E CONTROL TO THE PROPERTY OF THE PARTY OF TH	lended) Equity	
			31.03.2023.					P	Shares	
	The state of the s	re Danim						Dematerialise	_	
		Require						d	the year	
		ments)							and	
		Regulati							balance	
	percent of shareholding of	ons,201							Equity	
	promoter(s)	3							shares	
	and								are in the	
	ana						1		process	



promoter group is in dematerialized	of demateri alization
form and the	
same is	
maintained o	
n a continuous	
basis	
in the manner	
as specified by	
the Board	

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

Sr N o.	Compliance Requirement (Regulations/ circulars/guideline s including specific clause)	Regul ation/ Circul ar No.	Deviation s	Action Taken by	Typ eof Acti on	Detai ls of Viola tion	Fine Amo unt	Observation s/Remarks of the Practicing Company Secretary for the year ended 2022	Manag ement Respon se	Remarks
1	India (Listing Obligations and Disclosure Requirements) Regulations,2015Th e listed entity shall ensure that hundred percent of shareholding of promoter(s) and promoter group is in dematerialized form and the same	on 31(2) of Securities and Exchange Board of India (Listing Obligations and Disclosure Require ments)	percent of Shareholdi ng of promoter group was not dematerial		NA	NA	NA			NA
2	2076-77 March 30,2017 read with Reg.33(3) of (Listing Obligations and Disclosure	Circular DCS/CO MPI28/ 2076-77 March	filing of the financial results for quarter ended 30-		NA	NA	NA	The minor delay was due to technical reason.		NA





Regulations, 2015 Reg.33(3 have been			
Financial Results) ofuploaded			
are required to be (Listing beyond 30			
submitted alongObligatiominutes			
with the Limitedns and from the			
Review Report Disclosu conclusion			1
Audit Report first,re of Board			
in PDF modeRequire meeting.			
through the Listingments)			
Centre website Regulati			
Corporate ons, 20t5			
Announcement			
Filing System			
(CAFS) within 30			
minutes of the			
conclusion of the			
Board Meeting as			
per the provisions of		1	
Regulation 30 of the			
LODR, 2015.			
LODK, 2013.			

Sr. No.	Compliance Requirement (Regulations/ circulars/guidel ines including specific clause)	Regulation / Circular No.	The state of	Action Taken by	Type of	1	Fine Amount	Observations/ Remarks of the Practicing Company Secretary for the year ended 2021	Managem ent Response	Remarks
1	[1) and 30 (2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and amendments	30 (2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011	Disclosure submitted by promoters and		NA	NA		per Regulation 30(1) and 30[2] of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, promoters	Management has stated that the Promoter is have provided the necessary disclosures to the Company	



fin	nancial year						disclosures for the year 2020 and 2021 were reflected on BSE Website.		
See Ex Bo (L) Ob Di Ree Ree 20 Th en en hu pe sha of and prograde for sair main bar in as	ccurities and schange coard of India sisting bligations and sisclosure equirements) egulations, and stity shall asure that undred ercent of areholding promoter(s)	Securities and Exchange Board of India (Listing Obligations	percent of Shareholding of promoter group was not in dematerialise d for entire	NA	NA	NA	hundred only) Equity shares constituting to 14.96% of the entire promoter holding are yet to be Dematerialised.	Company has demateria lised 32 2,500 (Three Lacs Twenty- Two Thousand Five Hundred only) equity shares	Seven Thousand only) Equity shares constitutin g to 1.90% of the entire promoter holding are yet to be Dematerial ised.

Sr . N o.	Compliance Requirement (Regulations/ circulars/guidelin es including specific clause)	Regul ation/ Circul ar No.	Deviations	Action Taken by	Type oj Action	of Viola	Fine Amount	Practicing	Manageme nt Response	Remark s	
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	Regulation 30 [1) Regulati and 30 (2) of SEBI on 30 Disclosure (Substantial [1) and submitted by Acquisition of 30 (2) of promoters and Shares and SEBI Promoter (Substangroup of the Regulations, 2011 and amendments applicable thereon. Continual Shares of the Stock and Exchange for Disclosures by promoters and Promoter group of the Company within seven working days from the end of each financial year	NA	NA	NA	not appearing the on the necessary website of the disclosures Disc Stock to as re Exchange. the Company. Comhow they not refle on B Porta FY e 31.00 and 31.00 How	ne hageme he moters e moters e mitted ual elosures equired e mpany, ever were ected 3SE al for ended 3.2018
2	Regulation 31(2) Regulati of on 31(2) percent of Securities and of Shareholding Exchange Securitie of promoter Board of Indias and group was not (Listing Exchang in Obligations and Exchang in Obligations and Exchang in dematerialised Board of for entire Requirements) India FY ended Regulations, 2015. (Listing The listed entity Shall ensure that hundred percent of shareholding re of promoter(s) Require and ments) promoter group is Regulati in dematerialized form and the 2015. same is maintained o n a continuous	NA	NA	NA	Hundred percent of Shareholding of promoter group was not dematerial in dematerialise d for entire FY ended 31.03.2020 Hundred percent of S,69, Promoters (Three has not sixty completely thouse ised hundred their holdings share constant of the promoters (Three has not sixty completely thouse ised hundred their holdings share constant of the promoters (Three has not sixty completely thouse ised hundred their holdings share constant of the promoters (Three has not sixty completely thouse is described by the promoters (Three has not sixty completely thouse is described by the promoters of the promoters (Three has not sixty completely thouse is described by the promoters of the pro	ended 3.2020 ,500 ee lacs sand fred) ity es titutin to 6% of entire noter ing are to be paterial



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	basis									
	in the manner as									
	specified by the									
	Board									
3	Regulation 6(1) of	Regulati	Non-	BSE	Penalty	Non-		Non-	The	NA
			compliance	DOL	Tondity	complian	53 700	compliance	Company	INA
	Exchange	of o(1)	with			ce with	33,700	with	paid the	
			requirement			requirem			1.	
	(Listing		to appoint a						requisite	
			qualified			ent		to appoint a		
	Disclosure	CACHAIIg	-			to		qualified	Rs.	
	Requirements)	Doord of	company			appoint a		company	53,700/- to	
		India	Secretary as			qualified		-	BSE	
	compliance with					company		Distriction (Co.)	Limited on	
	requirement		compliance			Secretary		A	04.03.202	
		Obligati				as the		officer.	0.	
	qualified	The second secon	BSE Limited			complian		BSE Limited		
	company Secretary as the		Levied fine of Rs. 53,700/-			ce		Levied fine of		
	compliance	re Poguiro	Rs. 53,700/- (Fifty Three			officer.		Rs. 53,700/-		
	officer.	ments)	Thousand One					(Fifty Three		
	officer.	ments)	The second of th					Thousand		
			Hundred) and					One Hundred)		
								and		
			Freezing of promoter					Freezing of		
		k.	holding of the					promoter		
			Company.					holding of the		
4.	Regulation 7 (3)of	Regulati		NA	NA	NA	NA	Company. Regulation 7	The	NA
1.	SEBI		(3)of SEBI	1471	147.	IIA	INA		Company	INA
	Listing	The second second	[Listing						Secretary	
		100	Obligations						cum	
	Disclosure	Listing	_						Compliane	
	Requirements)		Disclosure						e	
	Regulations, 2015.							Requirements	The second of	
			Regulations,2)Regulations,		
	shall submit a	1	015 Signed by						appointed	
	compliance		Managing						and	
	certificate		Director						he has	
			instead of						signed the	
	duly signed by	ons,	Company						Reports	
			Secretary and						for the	
	TheCompliance		Compliance					Secretary and	and the same of th	
	officer of		officer of the						year	
	the listed entity		Company for					officer of the		
	and the		half year					Company for	The second second	
	authorised		ended						1.	
	representative of		September,					ended		
	the share	1	2019.					September,		
	transfer agent,							2019.		
	wherever							*		
	applicable,									
	within one month									
	of end of each half									



of the financial year, certifying compliance with the requirements of sub-regulation (2)								
Regulation 27 [2] c of SEBI (Listing Obligations and Disclosure Requirements) Regulations,2015 The listed entity shall submit a quarterly compliance report on corporate governance	on 27 [2] c of SEBI (Listing Obligations and Disclosure Require ments)	[2] c of SEBI (Listing Obligations and Disclosure Requirements) Regulations,2	NA	NA	NA	Managing Director instead of	Company Secretary cum Compliance e officer has been appointed and he has signed the Reports for the Financial year ended 31.03.202	

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.
- My responsibility is to certify based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
- I have not verified the correctness and appropriateness of financial Records and Books of Accountsofthe listed entity.
- 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.

Date: 30/05/2023 Place: Mumbai

ICSI UDIN: F002827E000422389 PEER REVIEW NO: 2507/2022 CP No.1483
FCS No.2827
* MUNIEAL CO

For HSPN & ASSOCIATES LLP Company Secretaries

Hemant S. Shetye Designated Partner FCS No.: 2827

COP No.: 1483