



**Secretarial Compliance Report of DAMODAR INDUSTRIES LIMITED for the  
year ended March 31, 2021**

We **Pramod Jain & Co** have examined:

- (a) all the documents and records made available to us and explanation provided by Damodar Industries Limited ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity ([www.damodargroup.com](http://www.damodargroup.com))
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

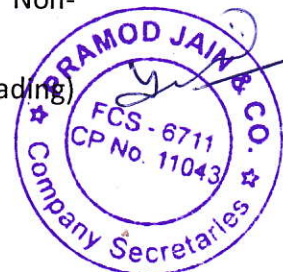
for the year ended March 31, 2021 ("Review Period") in respect of compliance with the provisions of :

- (a) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- (b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India ("SEBI");

The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include:-

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

and circulars/ guidelines issued thereunder;



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

(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:-

- Compliance Requirement (Regulations/ circulars /guidelines including specific clause): As per Schedule XIX – Para (2) of ICDR Regulations and SEBI circular no. SEBI/HO/CFD/DIL2/CIR/P/2019/94 dated 19/08/2019, the Issuer shall make an application to the exchange/s for listing within 20 days from the date of allotment.
- Deviations: The Company has not approached the Exchange for Listing application of 1048376 equity shares issued under preferential issue within 20 working days from the date of allotment of preferential shares.
- Observations/Remarks of the Practicing Company Secretary: The Company has approached the Exchange for listing application of 1048376 equity shares issued under preferential issue after 3 working days from the due date of Listing application. However, The Company has request to BSE Ltd. to wave off the fine and reason cited that delayed due to lock down of Covid -19 pandemic situation in the month of April 2020.

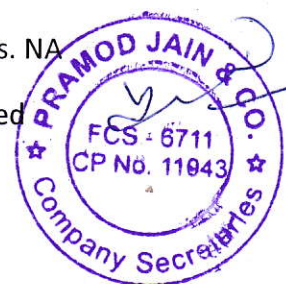
(b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from my/our examination of those records.

(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:

- Action taken: The BSE Ltd.
- Details of violation: The Company has not approached the Exchange for Listing application of 1048376 equity shares issued under preferential issue within 20 working days from the date of allotment of preferential shares.
- Details of action taken E.g. fines, warning letter, debarment, etc.: BSE Ltd. has imposed a fine for a said violation.
- Observations/ remarks of the Practicing Company Secretary, if any.: The Company duly paid fine as imposed by BSE.

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

- Observations of the Practicing Company Secretary in the previous reports. NA
- Observations made in the secretarial compliance report for the year ended March 31, 2020. None



- Actions taken by the listed entity, if any : NA
- Comments of the Practicing Company Secretary on the actions taken by the listed entity: NA

Place: Indore  
Date: June 28, 2021  
UDIN: F006711C000526615



For PRAMOD JAIN & CO.  
Company Secretary

(Pramod Kumar Jain)

Proprietor

FCS No. 6711 CP No. 11043