



Ragini Chokshi & Co.

Company Secretaries

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Annual Secretarial Compliance Report
of TILAKNAGAR INDUSTRIES LIMITED
for the year ended March 31, 2022

[Under Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015]

We have examined:

- (a) all the documents and records made available to us and explanation provided by TILAKNAGAR INDUSTRIES 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 March 31, 2022 ("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; **(Not Applicable to the Company during the Audit Period)**
- (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; **(Not Applicable to the Company during the Audit Period)**
- (g) Securities and Exchange Board of India (Issue and Listing of Non – Convertible and Redeemable Preference Shares) Regulations, 2013; **(Not Applicable to the Company during the Audit Period)**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; as amended from time to time,
- (i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 **(To the extent applicable)**
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:-

Sr. No	Compliance Requirement (Regulations/circulars/ guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
Not Applicable during the year under review			

- (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 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:

Sr. No	Action taken by	Details of violation	Details of actions taken E.g. fines, warning letter, debarment, etc	Observations/ remarks of the Practicing Company Secretary
Not Applicable during the year under review				

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

Sr. No	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
1	There was no Independent Woman Director on the Board of the listed entity from April 01, 2020 to July 30, 2020.	2021	The company has appointed Ms. Aparna Praveen Chaturvedi as an Independent Woman Director with effect from July 31, 2020. The Company has also paid the fine of Rs.1,77,000/- in this regard as levied by NSE.	Complied
2	<ul style="list-style-type: none"> The audited financial results (consolidated and standalone) for the financial year ended March 31, 2020 were filed by the Company with a delay of 45 days. 	2021	<ul style="list-style-type: none"> The Company has paid the fine of Rs. 94,400/- each to NSE and BSE in this regard. 	Complied

	<ul style="list-style-type: none"> The audited financial results (consolidated and standalone) for the quarter ended June 30, 2020 were filed by the Company with a delay of 20 days. 		<ul style="list-style-type: none"> The Company was charged with a fine of Rs. 1,23,900/- each by NSE and BSE. 	
3	<p>The Company submitted the disclosure w.r.t. defaults on payment of interest/ repayment of principal amount on loan from banks/financial institutions and unlisted debt securities was submitted to NSE with a delay of 3 days.</p> <ul style="list-style-type: none"> The Company has submitted the continual default disclosures to BSE & NSE with delay of 1 day. 	2021	No actions were required to be taken for the same.	Complied

Date: 18/05/2022
Place: Mumbai

FOR RAGINI CHOKSHI & CO.
(COMPANY SECRETARIES)

RAGINI CHOKSHI
(PARTNER)
Membership No: 2390
CP No: 1436
UDIN: F002390D000343885