



# RAJNEESH SHARMA & Co

COMPANY SECRETARIES

RAJNEESH SHARMA

FCS, Insolvency Professional, Registered Valuer (SFA), MMS (Finance)

FCS No: 5549, CP No: 24210

IP Regn No. : IBBI/IPA-002/IP-N01013/2020-2021/13249

RV Regn No. : IBBI/RV/03/2021/1443

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## **SECRETARIAL COMPLIANCE REPORT OF ARCHIDPLY INDUSTRIES LIMITED FOR THE YEAR ENDED 31<sup>ST</sup> MARCH 2022**

I Rajneesh Sharma, of Rajneesh Sharma & Co., have examined:

- (a) All the documents and records made available to us, either physically or by way of email in view of the prevailing pandemic situation of COVID -19 and explanation provided by **M/s ARCHIDPLY 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**, for the period from **1<sup>st</sup> April, 2021 to 31<sup>st</sup> March, 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 there-under; and
- (b) The Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made there-under and the Regulations, circulars, guidelines issued there-under by the Securities and Exchange Board of India ("SEBI");

The specific Regulations, whose provisions and the circulars/ guidelines issued there-under, 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: **(Not applicable for the current reporting period)**
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;

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**Mob:** 9986174563, **Web:** [www.csrajneeshsharma.com](http://www.csrajneeshsharma.com)

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- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018: **(Not applicable for the current reporting period)**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014: **(Not applicable for the current reporting period)**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008: **(Not applicable for the current reporting period)**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013: **(Not applicable for the current reporting period)**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- and based on the above examination, I hereby report that, during the review period:

- (a) The Listed entity has complied with the provision of the above Regulations and circular/ Guidelines issued thereunder, except in respect of matters specified below:-

| S. NO.     | Compliance Requirement<br>(Regulations/ circulars / Guidelines<br>including specific Clause) | Deviations | Observations/Remarks<br>of the Practising<br>Company Secretary |
|------------|----------------------------------------------------------------------------------------------|------------|----------------------------------------------------------------|
| <b>NIL</b> |                                                                                              |            |                                                                |

- (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 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:

| S. No      | Action taken by | Details of violation | Details of action<br>take e.g. fines,<br>warning letter,<br>debarment etc. | Observations/<br>Remarks of the<br>Practicing<br>Company<br>Secretary, if Any. |
|------------|-----------------|----------------------|----------------------------------------------------------------------------|--------------------------------------------------------------------------------|
| <b>NIL</b> |                 |                      |                                                                            |                                                                                |

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

| S. No | Observations/<br>Remarks of the<br>Practicing Company<br>Secretary, in the<br>previous reports | Observations<br>made in the<br>secretarial<br>compliance report<br>for the year ended<br>31.03.2021                                                                                                                                                                                  | Actions taken by<br>the listed entity,<br>if any                                                                                                                                                                                   | Comments of the<br>Practicing<br>Company<br>Secretary on the<br>actions taken by<br>the listed entity |
|-------|------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------|
| 1.    | Nil                                                                                            | The Company had already paid the fines of Rs. 59,000 each to the Stock Exchanges regarding the violation of Regulation 31 of SEBI (LODR), 2015 on May 31, 2021 and have requested the exchange for the waiver of fine. Which is pending for consideration before the Stock exchanges | The BSE & NSE stock exchanges have waived off the fine imposed on the Company for late filing of shareholding pattern under Regulation 31 of SEBI (LODR), 2015 vide its email / letter dated 27.01.2022 & 29.03.2022 respectively. | The matter stands resolved and complied with by the Company.                                          |

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- (e) The reporting of clause 6(A) and 6(B) of the circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019 issued by the Securities and Exchange Board of India on "Resignation of statutory auditors from listed entities and their material subsidiaries" is not applicable during the Review Period.

For RAJNEESH SHARMA & CO,  
COMPANY SECRETARIES

(RAJNEESH SHARMA)

Proprietor

FCS: 5549; CP No: 24210

UDIN: F005549D000355811

PR No.1771/2022

Place: Udaipur

Date: 20<sup>th</sup> May, 2022



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