



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

SECRETARIAL COMPLIANCE REPORT OF ARCHIDPLY INDUSTRIES LIMITED FOR THE YEAR ENDED 31ST MARCH 2021

I 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, 2021 [FY 2020-21 (“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;
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018:

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- (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 (Regulations/ circulars / Guidelines including specific Clause)	Deviations	Observations/Remarks of the Practising Company Secretary
1.	As per Regulation 31 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, the shareholding pattern of the Company is to be filed on quarterly basis with stock exchange on which the Company is listed within 21 days from the end of the closure of each Quarter	The Shareholding pattern for the quarter ended 31.03.2021 was to be filed on 21.04.2021. The Company has filed the same on 24.05.2021 with the BSE & on 17.05.2021 with NSE. There has been delay in filing.	The Company has rectified the deviation and has filed the shareholding pattern.

- (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

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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 take e.g. fines, warning letter, debarment etc.	Observations/ Remarks of the Practicing Company Secretary, if Any.
1.	Bombay Stock Exchange (BSE) & National Stock Exchange (NSE)	Regulation 31 of SEBI (LODR),2015: Delay in filing the shareholding pattern for the quarter ended 31 st March,2021	Fine of Rs. 59000/- each has been levied by BSE & NSE respectively for the delay of 25 days in filing the shareholding pattern for the quarter ended March 31, 2021	The Company had already paid the fines to the Stock Exchanges regarding the violation on May 31, 2021 and have requested the exchange for the waiver of fine. Which is pending for consideration before the Stock exchanges.

(d) The listed entity has taken the following actions to comply with the observations made in previous reports:
[Not applicable to 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: F005549C000482696

Place: Bangalore

Date: **18th June, 2021**

Address: B5-133 Janapriya Greenwoods Apt Somashetty Halli, Bangalore – 560 090.

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