

ISMT/SEC/21-22

June 24, 2021

Listing Department
BSE Ltd.
Phiroze Jeejeebhoy Towers
Dalal Street, Fort
Mumbai- 400001
Scrip Code:532479

Listing Department
National Stock Exchange of India Ltd.
Exchange Plaza, Plot No. C/1,G Block,
Bandra-Kurla Complex, Bandra (E)
Mumbai - 400051
Symbol: ISMTLTD

Dear Sirs,


Subject: Annual Secretarial Compliance Report - FY Ended March 31, 2021

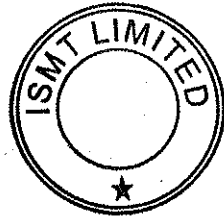
In terms of Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed Annual Secretarial Compliance Report of the Company for FY ended March 31, 2021.

Kindly take the same on your record.

Thanking you,

Yours faithfully,
For ISMT Limited


Chetan Nathani
Company Secretary
Encl.:As Above



SCT-0123, SL-0102



ISO/ATF : 16940:2016

Corporate & Registered Office
Panama House (Earlier known as Lunkad Towers),
Viman Nagar, Pune - 411 014, India.
Phone : +91 20 41434100 / 66024801 - 04 | Fax : +91 20 26830779
www.ismt.com
CIN : L27108PN1999PLC016417



ISO : 9001:2015



BS OHSAS 18001:2007
ISO : 14001:2015

Secretarial compliance report of ISMT LIMITED
For the year ended 31st March, 2021

We have examined:

- (a) all the documents and records made available to us and explanation provided by ISMT 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, 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 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 Review 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; **Not Applicable for the Review Period**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **Not Applicable for the Review Period**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Not Applicable for the Review Period**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **Not Applicable for the Review Period**



(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

(i) Securities and Exchange Board of India (Depositories Participants) Regulations, 1996;

(j) Other regulations as applicable circular/guideline 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 there under, 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
1	Regulation 31(2) of Securities Exchange Board of India (Listing Obligations & Disclosure Requirements) Regulation, 2015	One of the member of the Promoter Group holding 23,527 share aggregating to 0.02% of the total share capital of the company is not in dematerialize form	Misirilall Properties P Ltd. Member of Promoter group holding 23,527 share aggregating to 0.02% of the total share capital of the company is holding the said shares in physical form.

(b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under 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 there under:

Sr. No.	Action taken by	Details of violation	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/ Remarks of the Practicing Company Secretary, If any.
1	BSE & NSE	Regulation 33 of SEBI (LODR), 2015 There was delay of 27 days in submission of Quarterly Unaudited	The Company paid necessary fine of amounting to INR 1,59,300/- (Indian Rupees	As informed by the Company, the Financial Results could not get finalized within the prescribed



		Standalone & Consolidated Financial Results along with Limited Review Report for the quarter ended 30 th September, 2020 to Stock Exchanges	One Lakh Fifty Nine Thousand Three Hundred only) including GST to each of the stock exchanges.	timeline on account of restricted movement in the Office premises of the Company due to COVID-19 outbreak. The Fine was duly paid by the Company to NSE & BSE.
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(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 31 st March, 2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	Regulation 31(2) of SEBI (LODR) Regulations, 2015: Shareholding of one promoter group holding 23,527 shares or 0.02% of the total share capital is not in Dematerialized form.	<ul style="list-style-type: none"> Misrilal Properties Pvt. Ltd., Promoter Group holding 23,527 shares or 0.02% of the total share capital of the Company is holding the said shares in Physical Form The Company has informed that this entity was classified as Promoter Group by virtue of being related to Promoter Late Mr. AK Jain who was also a Director of the Company but not actively involved in day to day of affairs of the Company Mr. A K Jain passed away on 	The Company is following up with Misrilal Properties Pvt. Ltd. to either demat shares or apply for reclassification from Promoter to Public Category.	<ul style="list-style-type: none"> The Company is following up with Misrilal Properties Pvt. Ltd. to either dematerialize the shares or apply for reclassification from Promoter to Public Category.



		<p>April 12, 2013.</p> <ul style="list-style-type: none"> The Company is now taking steps to reclassify them from Promoter to Public category 		
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(e) The Company has complied with para 6(A) and 6(B) of the SEBI Circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019: During the period under review there were no event of resignation/appointment of statutory auditor.

“Verification of documents has been conducted virtually due to COVID-19 pandemic. This certificate is issued on the basis of information provided by the company and audit meetings conducted through video conferencing mode”.

For KPRC & Associates
Company Secretaries

CS Kuldeep Ruchandani
Partner
C.P. No. 8563
FCS 7971



Date: - 23/06/2021

Place: - Pune

UDIN: F007971C000503488