

**ECOBOARD INDUSTRIES LTD**

**ECOBOARD<sup>®</sup>**

**Ref: EIL/BSE/24A/2022-23/05/01**

**Date: 30<sup>th</sup> May, 2022**

**To,**  
Bombay Stock Exchange Limited  
Phiroze Jeejeebhoy Towers  
Dalal Street, Fort,  
Mumbai - 400 001

**Ref: - Symbol/ Scrip Code: - ECOBOAR/523732**

Dear Sir/Madam,

**Sub: Annual Secretarial Compliance Report in terms of Regulation 24A of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015 for the year ended on 31<sup>st</sup> March, 2022.**

In terms of the SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019, please find enclosed herewith the Annual Secretarial Compliance Report issued to the Company viz. Ecoboard Industries Limited by M/s Hitesh Desale & Associates, Company Secretaries, for the Financial Year ended 31<sup>st</sup> March, 2022.

Request you to kindly take the same on record.

Thanking you,

Your's Faithfully

**For Ecoboard Industries Limited**



**Praveen Kumar Raju Gottumukkala**  
Director



Encl.: Annual Secretarial Compliance Report under Regulation 24A of SEBI (LODR) Regulations, 2015





**Secretarial compliance report of Ecoboard Industries Limited for the yearended  
March 31, 2022**

I **Hitesh Balu Desale**, Practicing Company Secretary have examined:

- (a) all the documents and records made available to us and, explanation provided by Ecoboard Industries Limited (CIN: L24239MH1991PL1C064087) ("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;
- (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;
- (i) (Other regulations as applicable) and circulars/ guidelines issued thereunder;

*Hitesh Desale*

and based on the above examination, I hereby report that, during the ReviewPeriod:

(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
1	With reference to Amendment to SEBI (Prohibition of Insider Trading) Regulations, 2015 - Code of Conduct for Listed Companies - Trading Window Restriction – Trading window for dealing in securities shall remain closed from the end of the quarter up to 48 hours after declaration of result.	For the Quarter ended June 2021 trading window closed on 7 <sup>th</sup> July 2021.	The company complied closure of trading window by 7 days delay.
2	R. 53(2) of LODR - The listed entity shall submit a copy of the annual report sent to the shareholders along with the notice of the annual general meeting, not later than the date of commencement of dispatch to its shareholders.	For the Annual report for FY 2020-21 the company dispatched annual report to shareholder on 10 August 2021 and submitted to stock exchange on 11 August 2021.	The Company Complied R. 53(2) of LODR by 1 day delay.
3	R. 17 (1)(a) of LODR - board of directors shall have an optimum combination of executive and non-executive directors with at least one-woman director and not less than fifty per cent. of the board of directors shall comprise of non-executive directors.	Pursuant to the provisions of Section 152(6), Mrs. Venkata Sujani Indukuri (DIN: 01868347) who was appointed as Non-Executive Director w.e.f. 26th August, 2019 in the Board Meeting held on Wednesday, 14th August, 2019 was a retiring director and was eligible for re-appointment to the office of a Director at Annual General Meeting held on 03rd September, 2021 but the vacancy was not duly filled at the time of AGM.	The Company was failed to reappoint retiring Director Mrs. Venkata Sujani Indukuri, due to this office of woman director was vacated. Further the company appointed her as an additional director w.e.f. September 03, 2021.

(b) The listed entity has maintained proper records under the provisions of the above

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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: As per the information provided by the company no 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 action taken E.g., fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
1	NA	NA	NA	NA

- (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 March 31, 2021.	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	R 6 (1) Appointment of Compliance officer	Company has failed to Intimate appointment of CS Satish Deshmukh as a compliance officer to stock exchange in the Month of June 2020	Company appointed Mr. Satish Deshmukh as a Company Secretary and Compliance officer of the Company w.e.f. June 19, 2020 amid Covid-19 pandemic situation and due to medical emergency and nationwide lockdown he returned to his native place (Mumbai) and as a compliance officer of the Company was not present, Company could not able to	Due to Nationwide lockdown due to covid-19 pandemic The Company could not able to fulfil the requirement of the law to intimate.

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			fulfil the requirement of the law to intimate.	
2	R 7 (3) The entity shall submit a compliance certificate to the exchange, duly signed by both the compliance officer of the listed entity and the authorized representative of the share transfer agent, wherever applicable, within one month from the end of each half of the financial year, certifying compliance with the requirements of sub-regulation (2) & circular No. SEBI/HO/CFD/CMD1/CIR/p/2020/38 dt. 19, March 2020.	Delay in submission: for the half year ended March 2020 there was delay by 20 days beyond the time prescribed in the Circular.  For the half year ended September 2020 there was total delay in submitting the by 68 days.	The company is always punctual in submissions to the stock exchange, the said compliance was missed out inadvertently due to COVID and lack of resources, there was a lockdown and our company was located in containment zone in Pune, but anyhow the Company has complied with the same.	As per the information and explanation provided by the management due to covid 19 pandemic situation and subsequent nation wide lockdown the company could not submit compliance certificate under R. 7(3) within time.
3	R. 13 (3) - The Listed entity shall file with the recognized stock exchange on a quarterly basis, within twenty-one days from the end of each quarter, a statement giving the number of investor complaints pending at the beginning of the quarter, those received during the quarter, disposed of during the quarter and those remaining unresolved at the end of the quarter.	Company status on scores portal is suspended therefore we are unable to login.	Company is in compliance of Regulation 13(3) of SEBI and the same intimated to public through BSE. Further, the company has recovered the Login from SCORES portal and regularly checks any complaints if any made. Hence the company complied with the same.	The company is now complied with R. 13 (3) of LODR.
4	R. 23 (9) - Disclosure of related party transactions to stock exchange and on website of the Company.	No disclosure for half year ended on March 2020 of related party transactions were made on a consolidated basis to stock exchange.	Due to COVID, there was a lockdown and our company was located in containment zone in Pune, the Company was unable to make half year disclosures of related party transactions. But now the Company has complied with the same.	As per the information and explanation provided by the management due to covid 19 pandemic situation and subsequent nation wide lockdown the company could not submit compliance certificate under R. 23(9) within time.

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5	R. 27 (2) – The Listed entity shall submit a quarterly compliance report on corporate governance in the format as specified by the Board from time to time to the recognized stock exchange within twenty-one days from the end of each quarter.	Delay in reporting: March 2020 – 40 days June 2020– 8 days.	The Company delay has made due to COVID, there was a lockdown and our company was located in containment zone in Pune, and the Company has no intention for such delay.	As per the information and explanation provided by the management due to covid 19 pandemic situation and subsequent nation wide lockdown the company could not submit compliance certificate under R. 27 (2) within time.
6	R. 23 (1)(a) – The Listed entity shall give prior intimation to stock exchange about the meeting of the board of directors in which proposal is due to be considered for financial results.	Company has failed to give prior intimation for the quarter ended September 2020	The same was intimated to the exchange within due time, dated November 8, 2020 at 11:29 PM. However, the Subject / Compliance Regulation mentioned was inadvertently written as “Board Meeting Intimation for Meeting of the Board of Directors of the Company is Scheduled to be held on Friday, November 07, 2020 At 11.00 A.M. to Inter — Alia Consider, Approve And Adopt The Unaudited Financial Results For The Quarter Ended September 30, 2020” which was a clerical mistake as the actual meeting was held on Friday, November 13, 2020. However, the company has no specific intention for the said non-compliance.	The company is now complied with R. 23 (1)(a) of LODR.
7	R. 30 (6) read with	There was a slight	The Company has	As per the

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	schedule III Part A-(A)(h) – The Listed entity shall disclose to the exchange within 30 minutes of the closure of the meeting, held to consider quarterly financial results.	delay of 12 mins and 16 minutes respectively for march and September quarter	made the delay compliance due to COVID, there was a lockdown and our company was located in containment zone in Pune, and the Company has no intention for such delay.	information and explanation provided by the management due to covid 19 pandemic situation and subsequent nation wide lockdown the company could not submit compliance certificate under R. 30 (6) read with schedule III Part A-(A)(h) within time.
8	R. 31 (1) – Quarterly disclosures of statement showing holding of securities and shareholding pattern separately for each class of securities, within twenty-one days from the end of each quarter.	Delay in reporting: March 2020- 38 days June 2020 – 7 days.	Due to COVID, there was a lockdown and our company was located in containment zone in Pune, the Company has made the delay compliance and the Company has no intention for such delay.	As per the information and explanation provided by the management due to covid 19 pandemic situation and subsequent nation wide lockdown the company could not submit compliance certificate under R. 31 (1) within time.
9	R. 33(3)(a) – The Listed entity shall submit quarterly and year-to-date exchange within forty-five days of end of each quarter, other than the last quarter.	Delay in submission of financial results: June 2020 – 31 Days	Due to COVID, there was a lockdown and our company was located in containment zone in Pune, the Company has made the delay compliance and the Company has no intention for such delay.	As per the information and explanation provided by the management due to covid 19 pandemic situation and subsequent nation wide lockdown the company could not submit compliance certificate under R. 33(3)(a) within time.
10	R. 33(3)(d) – The Listed entity shall submit annual audited standalone financial results for the financial year, within Sixty days from the end of the financial year along with audit report and statement on impact of Audit Qualifications (applicable only for audit report with modified opinion)  Read with CIRCULAR SEBI/HO/CFD/CMD/CI R/P/2020/38 March 19,	Delay in submission of financial results: March 2020 – 30 days.	The company, is always punctual in submissions to the stock exchange, the said compliance was due to COVID and our company was located in containment zone in Pune.	As per the information and explanation provided by the management due to covid 19 pandemic situation and subsequent nation wide lockdown the company could not submit compliance certificate under R. 33(3)(d) within time.

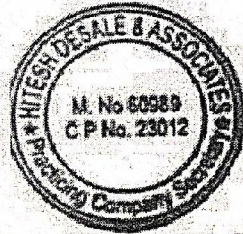
*HTS/2021*

	2020			
11	R. 33(2)(a) – The quarterly financial results submitted shall be approved by the board of directors: Provided that while placing the financial results before the board of directors, the Chief Executive officer and chief financial officer of the listed entity shall certify that the financial results do not contain any false or misleading statement or figures and do not omit any material fact which may make the statements or figures contained therein misleading.	Quarterly financial statements were approved by the CMD and CFO of the Company.	Quarterly financial statements were approved by the CMD and CFO of the Company as per the provision of Companies Act, 2013 and SEBI Regulations. Now the Company has appointed MD as CEO of the Company dated 10.08.2021 to be more precise with the law.	The company is now complied with R. 33(2)(a) of LODR.
12	R. 34(1)(a) – A copy of the annual report sent to the shareholders along with the notice of the annual general meeting not later than the day of commencement of dispatch to its shareholders.	Delay in submitting copy of the annual report with the stock exchange by 8 days.	The company is always punctual in submissions to the stock exchange, the said compliance was missed but inadvertently due to COVID and there was a lockdown and our company was located in containment zone in Pune.	As per the information and explanation provided by the management due to covid 19 pandemic situation and subsequent nation wide lockdown the company could not submit compliance certificate under R. 34(1)(a) within time.
13	R. 40(9) read with sub regulation (10) – The listed entity shall ensure that the share transfer agent and/o the in-house share transfer facility, as the case may be, produces a certificate from a practicing company secretary within one month of the end of each half of the financial year, certifying that all certificates have been issued within thirty days of the date of lodgment for transfer, subdivision, consolidation, renewal, exchange or endorsement of calls/allotment monies.	Delay in reporting: March 2020 – 30 days Sept 2020 – 58 days.	Due to COVID, there was a lockdown and our company was located in containment zone in Pune, the Company has made the delay compliance and the Company has no intention for such delay.	As per the information and explanation provided by the management due to covid 19 pandemic situation and subsequent nation wide lockdown the company could not submit compliance certificate under R. 40(9) read with sub regulation (10) within time.

14	R. 47 – Advertisements in Newspapers	Company has not published the information in the newspaper as prescribed in the regulation except for notice of board meeting held on 13th February, 2021 & for the financial results for the quarter ending on 31st December, 2020	The company is always tries to be in compliances with Laws but the said compliance was missed out inadvertently due to COVID. But now company always advertises the financial in both the newspaper and is in compliance.	As per the information and explanation provided by the management due to covid 19 pandemic situation and subsequent nation wide lockdown the company could not submit compliance certificate under R. 47.
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For M/S Hitesh Desale & Associates.  
Company Secretaries

*Hitesh Desale*



Hitesh B Desale  
Proprietor  
ICSI Membership No: A60989  
CP No: 23012  
UDIN: A060989D000428081

Date: 30<sup>th</sup> May, 2022  
Place: Pune