



# Ragini Chokshi & Co.

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## Company Secretaries

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### SECRETARIAL COMPLIANCE REPORT OF NATIONAL PLASTIC 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 NATIONAL PLASTIC 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; **(Not Applicable to the Company during the Audit 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 to the Company during the Audit Period)**
- E. Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;**(Not Applicable to the Company during the Audit Period)**
- 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;
- I. Securities and Exchange Board of India (Depositories & 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
No such event during the period 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.	Regulation 17(1)(b) of the SEBI (LODR), 2015: There was a non-compliance in the composition of the board of directors in regards to the minimum requirement of Independent directors during the period from August 18, 2020 till February 12, 2021.	31 <sup>st</sup> March, 2021	The Company has appointed requisite number of Independent Directors	Complied
2.	Regulation 25(6) of the SEBI (LODR), 2015: The company has appointed a new ID Vipul Desai on 12/02/2021, in place of the ID who retired on 18/08/2020. However, the new appointment should have been made on or before 18 <sup>th</sup> November 2020.	31 <sup>st</sup> March, 2021	-	Complied
3.	Regulation 18(2)(b) of SEBI	31 <sup>st</sup> March,	The	Complied



	LODR, 2015: The company has improper quorum present in the audit committee meetings held on 30/06/2020, 14/08/2020 & 12/02/2020 with having only one ID instead of two.	2021	Company has appointed requisite number of Independent Directors	
4.	SEBI (Prohibition of Insider Trading) Regulations, 2015 and clarification given by BSE Limited vide circular No. LIST/COMP/01/2019-20 dated 2nd April, 2019 Trading Window for consideration of Unaudited Financial Results for June, 2020 were closed w.e.f. 2nd July, 2020 instead of closing from 1st July, 2020	31 <sup>st</sup> March, 2021	-	Complied

Place: Mumbai  
Date: 23/05/2022



For Ragini Chokshi & Co.

(Company Secretaries)

Makarand Patwardhan  
(Partner)

Membership No: 11872  
CP No: 9031

UDIN: A011872D000371165