



V. AGNIHOTRI & ASSOCIATES
Company Secretaries

SECRETARIAL COMPLIANCE REPORT OF NEIL
INDUSTRIES LIMITED FOR THE YEAR ENDED MARCH 31,
2021

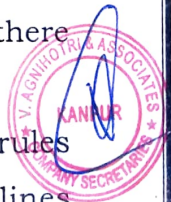
To,
The Board of Directors,
Neil Industries Limited
Reg: 88B, Ground Floor,
Lake View Road,
Kolkata-700029

I, Vaibhav Agnihotri, Proprietor of M/s V. Agnihotri & Associates have examined:-

- (a) all the documents and records made available to us and explanation provided by **Neil 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 ("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



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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**
- (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**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **Not Applicable**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Not Applicable**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **Not Applicable**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993;
- (j) Other Rules/Regulations, and circulars/guidelines, issued there under applicable to the Listed entity-

I hereby report that during the Review Period:



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- (a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued there under;
- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under in so far as it appears from my examination of those records;
- (c) As informed to us, there are 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 there under; except in respect of matter specified below:

S.No.	Compliance Requirement	Deviation	Observations/ Rectification
1.	Regulation 17(1) read with SEBI SOP Circulars	Non Appointment of sixth Director in the Company after falling in the Top 2000 entities w.e.08th April 2020	Sixth Director Appointed on 13.08.2020 just after it was practically possible to hold a Board Meeting. The detailed Reply submitted by the Company to the Exchange.



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- (d) The reporting of actions taken against listed entity to comply with the observations made in the previous reports does not arise.

For V. Agnihotri & Associates
Company Secretaries


Vaibhav Agnihotri
(Proprietor)



Mem. No. 10363
C. P. No.: 21596

Place: Kanpur

Date: 21/05/2021

UDIN: F010363C000352672

*******END OF REPORT*******

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