

**PODDAR**  
PIGMENTS LTD.

Ref : PPL/JPR/SECT/22-23

Dated : 24<sup>th</sup> May, 2022

BSE Ltd.,  
Phiroze Jeejeebhoy Towers,  
25th Floor, Dalal Street, Fort,  
**Mumbai - 400 001**

National Stock Exchange of India Ltd.,  
Exchange Plaza, Plot No. C/1, G Block,  
Bandra-Kurla Complex, Bandra (E),  
**Mumbai - 400 051**

**Company Code: 524570**

**Company Symbol: PODDARMENT**

**Sub: Secretarial Compliance Report for the year ended 31<sup>st</sup> March, 2022**


Dear Sir(s),

Please find enclosed herewith the Secretarial Compliance Report for the year ended 31<sup>st</sup> March, 2022, in terms of Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended.

Kindly take the same for your records.

Thanking you,

Yours faithfully,  
For **Poddar Pigments Limited**

  
(Navin Jain)  
AVP (Legal) & Company Secretary

**Encl: As above**

**PODDAR PIGMENTS LIMITED**  
**E-10-11, F-14-16, RIICO INDUSTRIAL AREA**  
**SITAPURA, JAIPUR-302022**

**SECRETARIAL COMPLIANCE AUDIT REPORT**  
**FOR THE YEAR ENDED**  
**31<sup>ST</sup> MARCH, 2022**

**BABU LAL PATNI**  
**COMPANY SECRETARY**  
**51, NALINI SETT ROAD**  
**5<sup>TH</sup> FLOOR, ROOM NO-19**  
**KOLKATA-700007**

**BABU LAL PATNI  
COMPANY SECRETARY**

**51, NALINI SETT ROAD  
5<sup>TH</sup> FLOOR, ROOM NO 19  
KOLKATA - 700 007  
TEL NO: 2259-7715/6  
Email Id:patnibl@yahoo.com**

Secretarial Compliance Report of M/s. Poddar Pigments Limited For The Year Ended 31st March, 2022..

I Babu Lal Patni have examined:

- (a) All the documents and records made available to me and explanation provided to me by Poddar Pigments 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 31<sup>st</sup> March, 2022 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”);
- (c) The Depositories Act, 1996 and the Regulations and Bye-laws framed there under;

The Specific Regulations, whose provisions and the circulars / guidelines issues thereunder, have been examined, include:-

- a) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- b) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- c) \*The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- d) \* The Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 ( up to 12<sup>th</sup> August 2021) and The Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021( with effect from 13<sup>th</sup> August 2021);
- e) \*The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- f) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with clients;

- g) \*The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; and
- h) \*The Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 ( with effect from 16<sup>th</sup> August 2021).
- i) The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

\* No event took place under these regulations during the audit period.

and circulars/guidelines issued thereunder; and based on the above examination, I hereby report that, during the Review Period:

- (a) The listed entity has complied with the provisions of the above Regulations, and circulars/guidelines issues thereunder, except in respect of matters specified below: **NIL**

<b>Sr. No.</b>	<b>Compliance Requirement (Regulations / circulars / guidelines including specific clause)</b>	<b>Deviations</b>	<b>Observation / Remarks of the Practising Company Secretary</b>

- (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 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: **NIL**

<b>Sr. No.</b>	<b>Action taken by</b>	<b>Details of violation</b>	<b>Details of action taken e.g. fines, warning letter, debarment, etc</b>	<b>Observations/ remarks of the Practising Company Secretary, if any</b>

(d) The listed entity has taken the following actions to comply with the observations made in previous reports; NA

<b>Sr. No.</b>	<b>Observations of the Practising Company Secretary in the previous reports</b>	<b>Observations made in the Secretarial Complaine Report for the year ended 31<sup>st</sup> March, 2021</b>	<b>Actions taken by the listed entity, if any</b>	<b>Comments of the Practicing Company Secretary on the actions taken by the listed entity</b>
	NIL	NIL		

**Place: Kolkata**

**Dated: 10<sup>th</sup> May, 2022.**

**Signature:**

**Name of the company: BABU LAL PATNI**

**Secretary in Practice**

**FCS No. : 2304**

**C.P. No. : 1321**

**UDIN : F002304D000293914**