

**INDUSTRIAL & PRUDENTIAL INVESTMENT CO. LTD**
CIN No.: L65990WB1913PLC218486

Ref: INP/21-22/BSE/ASC 24A
Date: 23rd May, 2022

To
BSE Limited
Dy. General Manager
Corporate Relationship Department
P. J. Towers, Dalal Street
Mumbai- 400 001

Ref: COMPANY CODE: 501298

Sub: Regulation 24A- Annual Secretarial Compliance Report for the year ended March 31, 2022

Dear Sir,

With reference to the above subject, we herewith enclose the Annual Secretarial Compliance Report of the Company for the year ended 31st March, 2022 issued by the Secretarial Auditor of the Company.

Kindly take the same on record.

For INDUSTRIAL & PRUDENTIAL INVESTMENT CO. LTD.,



Ayan Datta
Company Secretary

Encl: As above.

MAYUR MEHTA

B.Com. (Hons.), A.C.S., A.C.A., M.A. (Hist.)

PRACTISING COMPANY SECRETARY

Secretarial compliance report of

Industrial And Prudential Investment Company Limited

for the year ended 31st March, 2022

[Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

I, Mayur Mehta, Practising Company Secretary, have examined:

- (a) all the documents and records made available to me and explanation provided by Industrial And Prudential Investment Company 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, 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

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Tel. 24454177 Cell: 9821735704 .

Email: mayur.cs@mtnl.net.in Alternative Email: mayur2753@gmail.com





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- Disclosure Requirements) Regulations, 2015 (LODR);
- (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;

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

The listed entity has generally complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters

Sr.No	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations / Remarks of the Practicing Company Secretary
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1	Regulation 29 of LODR	Delay in furnishing prior intimation about the meeting of the board of directors.	This is caused due to some technical issues in the system. The company had contested the levy of fine and had deposited the amount under protest.
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(a) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from my examination of those records.

(b) 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 action taken E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
1	BSE LTD	Regulation 29 of LODR	By email dated 14.09.2021, fine of INR 10,000 (Rupees Ten Thousand Only) excluding GST @18% was imposed by the BSE Ltd.	This is caused due to some technical issues in the system. The company had contested the levy of fine and has deposited the amount under protest.

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(c) The listed entity has taken the following actions to comply with the observations made in previous reports:

Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended 31.03.2021	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
<p>Non - Submission of the annual report for the financial year March 2020 within the period prescribed under this regulation.</p> <p>This is caused due to some technical issues in the system. However, the company has duly submitted the statement to the BSE again. The company had contested the levy of fine and has deposited the amount under protest.</p>	<p>Secretarial audit report dated 16.06.2021</p>	<p>Fine of INR 22,000 excluding GST @18% was imposed by the BSE Ltd. The Company the fine under protest and requested BSE for waive-off.</p>	<p>The BSE has vide email dated 17th September 2021 waived off the penalties</p>
<p>Non- Compliance with disclosure of related party transaction on consolidated basis for the half year ended September 2020 within the period prescribed under this regulation.</p> <p>This is caused due to some technical issues in the system. However, the company has duly</p>	<p>Secretarial audit report dated 16.06.2021</p>	<p>Fine of INR 1,75,000 excluding GST @18% was imposed by the BSE Ltd. The Company the fine under protest and requested BSE</p>	<p>The BSE has vide email dated 20th July 2021 waived off the penalties</p>

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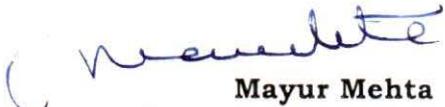
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submitted the statement to the BSE again. The company had contested the levy of fine and has deposited the amount under protest.		for waive-off.	
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This report is to be read with Secretarial Audit report under Section 204 of the Act and the Certificate of Compliance of Conditions of Corporate Governance of even date.


Mayur Mehta
Practising Company Secretary
ACS 3132
C P No 9952
PRC 1694/2022

Place: Kolkata
Date 20.05.2022
UDIN: A003132D000324838



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