

Secretarial Compliance Report of Duroply Industries Limited
for the year ended 31st March, 2021

I, Rashmi Sharma, *Practicing Company Secretary*, have examined:

- (a) all the documents and records made available to me and explanation provided by **Duroply Industries Limited** (CIN : L20211WB1957PLC023493) having its Registered Office at 9, Parsee Church Street, Kolkata – 700001, West Bengal (“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, 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 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, as amended, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include:-

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosures Requirements) Regulations, 2015;
- (b) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (c) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;



- (d) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;

and circulars/ guidelines issued thereunder; and based on 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 issued thereunder, except in respect of matters specified below:-

| Sl. No. | Compliance Requirement (Regulations/ circulars/guidelines including specific clause) | Deviations | Observations/ Remarks of the Practising Company Secretary |
|---------|--|---|---|
| 1. | <p><i>Regulation 9(1) read with Schedule B of SEBI (Prohibition of Insider Trading) Regulations, 2015 –</i></p> <p>Trading restriction period shall be made applicable from the end of every quarter till 48 hours after the declaration of financial results.</p> | <p>Delay in intimating the Stock Exchange for closure of trading window</p> | <p>Intimation for closure of Trading Window from 1st July, 2020 till 48 hrs after the publication of financial results for the quarter ended 30th June, 2020 was submitted on 4th July, 2020.</p> |

- (b) 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.
- (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:





| Sl.No | Action taken by | Details of Violation | Details of Action taken E.g. fines, warning letter, debarment, etc. | Observations/ Remarks of the Practising Company Secretary, if any. |
|-------|-----------------|----------------------|---|--|
| - | - | None | - | - |

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

| Sl.No | Observation of practising 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, in any | Comments of the Practising Company Secretary on the actions taken by the listed entity |
|-------|---|--|--|--|
| - | None | - | - | - |

Rashmi Sharma

Place : Kolkata
Date :24/06/2021

(CS RASHMI SHARMA)
Practicing Company Secretary
FCS – 8660 / CP No.- 8051
UDIN: F008660C000507400