

BHANDARI & ASSOCIATES

Company Secretaries

901, Kamla Executive Park, Off. Andheri Kurla Road,
J. B. Nagar, Andheri East. Mumbai- 400 059
Tel: +91 22 4221 5300 Fax: +91 22 4221 5303
Email: mumbai@anilashok.com

Secretarial compliance report of Kabra Extrusiontechnik Limited For the Financial Year ended March 31, 2022

[Regulation 24A of SEBI (Listing Obligations Disclosure Requirements) Regulations 2015] read with SEBI Circular CIR/CFD/CMD 1/2 7/2019 dated February 08, 2019]

We, Bhandari & Associates, have examined:

- a) all the documents and records made available to us and explanation provided by **Kabra Extrusiontechnik 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 financial 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) The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("the Listing Regulations");
- b) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- c) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 ["SEBI (SAST) Regulations, 2011"];
- d) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018#;
- e) The Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021#;
- f) The Securities and Exchange Board of India (Issue and Listing of Non-Convertible Debt Securities) Regulations, 2021#;
- g) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- h) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021#;
- i) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

B&A



and circulars/guidelines issued thereunder including the provisions of SEBI Circular CIR/CFD/CMD1/114/2019 dated October 18, 2019, in terms of Para 6(A) and 6(B) of the said circular.

The Regulations or Guidelines, as the case may be were not applicable for the period under review.

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
1.	<p>Regulation 30 read with Para A of Part A of Schedule III of the Listing Regulations:</p> <p>Outcome of Meetings of the board of directors - The listed entity shall disclose to the Exchange(s), within 30 minutes of the closure of the meeting are deemed to be material events and listed entity shall make disclosure of such events. held to consider the following: h) financial results</p>	<p>The outcome of the meeting of the Board of Directors held on January 21, 2022 was disclosed to BSE Limited beyond the prescribed timeline of 30 minutes from closure of the meeting.</p>	<p>The outcome was disclosed to BSE Limited at 01:06 p.m. i.e., with a delay of six (06) minutes. However, the disclosure were made to National Stock Exchange of India Limited within the prescribed timeline.</p>
2.	<p>Regulation 30 of the Listing Regulations:</p> <p>(5) The board of directors of the listed entity shall authorize one or more Key Managerial Personnel for the purpose of determining materiality of an event or information and for the purpose of making disclosures to stock exchange(s) under this regulation and the contact details of such personnel shall be also disclosed to the stock exchange(s) and as well as on the listed entity's website.</p>	<p>The Listed Entity in its meeting of the Board of Directors held on December 25, 2021, has appointed a new Company Secretary who would act as a compliance officer and a Key Managerial Personnel (KMP) and an authority to determine materiality of events / information and its disclosure to Stock Exchange(s). However, the disclosure that the new Company Secretary is authorized for determining materiality of events/information and his contact details are not submitted to the Stock Exchange(s).</p>	<p>The requisite disclosure of the new Company Secretary as a new authority to determine materiality of events/information and his contact details as a KMP under Regulation 30(5) of the Listing Regulations was not intimated to the Stock Exchange(s).</p>



(b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder so far as it appears from 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 action taken E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
Nil				

(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	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	The Listed Entity in the capacity of shareholder in promoter group of Plastiblends India Ltd. (a listed company), has made the continual disclosure to the Stock Exchange(s) under Regulation 30 of SEBI (SAST) Regulations, 2011 beyond the stipulated extended period.	March 31, 2021	The requisite disclosure was filed on June 24, 2020.	None

For Bhandari & Associates
 Company Secretaries
 Firm Registration No: P1981MH043700

Manisha



Manisha Maheshwari
 Partner
 ACS No: 30224; C. P. No.: 11031
 Mumbai | May 30, 2022
 ICSI UDIN: A030224D000425718