

# DILIGENT INDUSTRIES LIMITED

Dwaraka Thirumala Road, Denduluru Village & Mandal, West Godavari District, Andhra Pradesh - 534 432  
Ph : 08829 - 256077 / 99, Email : dilligentind@gmail.com

GSTIN : 37AAACY0495Q1ZL

CIN : L15490AP1995PLC 088116

30/06/2020

To  
The Corporate Relationship Department  
BSE Limited  
Floor 25, P.J.Towers,  
Dalal Street,  
**Mumbai- 400001**

**Sub: Submission of ANNUAL SECRETARIAL COMPLIANCE REPORT Under Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015**

**Ref.: Scrip code: 531153; Stock Symbol: Diligent Industries Limited**

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We hereby enclosed the Annual Secretarial Compliance Report from a Practicing Company Secretary as required under Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Kindly take same on Record.

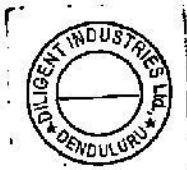
Thanking you,

Yours Sincerely,

For Diligent Industries Limited

V. B. V.

**Bhanu Prakash Vankineni**  
**Managing Director**



**Encl:** As above

## ANNUAL SECRETARIAL COMPLIANCE REPORT

OF

**DILIGENT INDUSTRIES LIMITED**

**FOR THE FINANCIAL YEAR ENDED 31<sup>ST</sup> MARCH, 2020**

*(Under Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015)*

I Kode Hemachand, Practicing Company Secretary have examined:

- a. all the documents and records made available to us and explanation provided by M/s. Diligent 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. other document/filing, as may be relevant, which has been relied upon to make this certification,

for the year ended March 31, 2020 ("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 Disclosure Requirements) Regulations, 2015;
- 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; - *Not Applicable to the listed entity during the audit period.*



- e. Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; - *Not Applicable to the listed entity during the audit period.*
- f. Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; - *Not Applicable to the listed entity during the audit period.*
- g. Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; - *Not Applicable to the listed entity during the audit period.*
- h. Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i. The Depositories Act, 1996;
- j. Securities and Exchange Board of India (Registrars to an issue and Share Transfer Agents) Regulations, 1993
- k. Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018;  
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 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	Regulation 14 of SEBI (LODR) Regulations, 2015 - Fees and other charges to be paid to the recognized stock exchange(s)	Non-payment of Annual Listing Fees	Company not paid Annual Listing Fees - Equity Segment for FY 2019-20
2	Regulation 6(1) of SEBI (LODR) Regulations, 2015 – Listed entity shall appoint a qualified CS as Compliance Officer	Not appointed Company Secretary	Company Secretary resigned on 15.04.2019 and thereafter no Company Secretary was appointed as Compliance Officer
3	Regulation 17(1) of SEBI (LODR) Regulations, 2015 – Composition of Board	Not appointed Independent Director	One Independent Director (ID) resigned on 28/11/2019 and the said position was not filled so far.

- 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:

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	Company not paid ALF - Equity for FY 19-20	Vide Circular no LIST/COMP/OPS/ 16 /2019-2020 dated June 11, 2019 by BSE - Trading is Suspended  DEMAT accounts of the Promoter and Promoter Group of the Company was frozen for all debits	Company not paid ALF - Equity for FY 19-20, accordingly Trading is Suspended by BSE vide Circular no LIST/COMP/OPS/ 16 /2019-2020 dated June 11, 2019

- 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	No observations	--	--	--



**CS Kode Hemachand**  
Practicing Company Secretary  
M No: A35463  
CP No: 13416

**Place:** Vijayawada  
**Date:** 29.06.2020  
**UDIN:** A035463B000397473