

DILIGENT INDUSTRIES LIMITED

CIN: L15490AP1995PLC088116

Registered Office : Dwarka Thirumala Road, Denduluru Village and Mandal, West Godavari-534 432,
Andhra Pradesh - 534432, Phone No: 08829-256077/99, Fax: 08829-256088
E-mail: diligentinvestors@gmail.com, Website: www.diligentindustries.com

26th June, 2021

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

Sub: Submission of Secretarial Compliance Report for the year ended 31.03.2021 as per Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

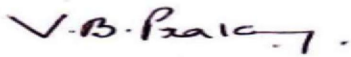
Ref.: Scrip code: 531153; Stock Symbol: Diligent

We hereby submit the Secretarial Compliance Report for the year ended 31.03.2021 issued by 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**



Bhanu Prakash Vankineni
Managing Director
DIN: 00919910



ANNUAL SECRETARIAL COMPLIANCE REPORT

OF

DILIGENT INDUSTRIES LIMITED

FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2021

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

I Kode Hemachand, Practicing Company Secretary have examined:

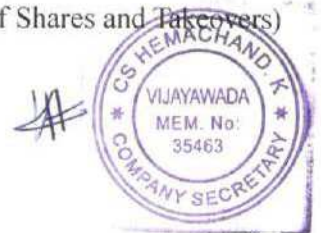
- all the documents and records made available to us and explanation provided by M/s. Diligent Industries Limited ("the listed entity"),
- the filings/ submissions made by the listed entity to the stock exchanges,
- website of the listed entity,
- other document/filing, as may be relevant, which has been relied upon to make this certification,

for the year ended March 31, 2021 ("Review Period") in respect of compliance with the provisions of:

- the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- 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:-

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- 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 6(1) of SEBI (LODR) Regulations, 2015 – Listed entity shall appoint a qualified CS as Compliance Officer	Not appointed Company Secretary till 14/09/2020	Company Secretary resigned on 15.04.2019 and thereafter no Company Secretary was appointed till 14/09/2020.
2	Regulation 17(1) of SEBI (LODR) Regulations, 2015 – Composition of Board	Not appointed required number of Independent Directors till 14/09/2020	Company appointed two Independent Directors Mr. Baba Mohammed and Mr. Lokeswararao Nelluri w.e.f. 04/12/2020 and 14/09/2020 respectively.



- 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	Not Applicable	Vide Notice No. 20201016-8 dated 16 Oct 2020 suspension in trading of equity shares of the company revoked w.e.f October 21, 2020	It is observed that BSE has continued the freezing of promoter DEMAT accounts even after revocation of suspension of equity shares due to non-payment of fines for non-compliances / delay submissions etc.

- 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	Non-payment of Annual Listing Fees - Regulation 14 of SEBI (LODR) Regulations, 2015 - Fees and other charges to be paid to the recognized stock exchange(s)	Company not paid Annual Listing Fees - Equity Segment for FY 2019-20	Company has paid the ALF	No Comments
	Not appointed Company Secretary - Regulation 6(1) of SEBI (LODR) Regulations, 2015 - Listed entity shall	Company Secretary resigned on 15.04.2019 and thereafter no Company Secretary was appointed as	Company Secretary and Compliance Officer was appointed	No Comments



	appoint a qualified CS as Compliance Officer	Compliance Officer	by the Company w.e.f. 14/09/2020	
	Not appointed Independent Director - Regulation 17(1) of SEBI (LODR) Regulations, 2015 - Composition of Board	One Independent Director (ID) resigned on 28/11/2019 and the said position was not filled so far.	Company appointed two Independent Directors Mr. Baba Mohammed and Mr. Lokeswararao Nelluri w.e.f. 04/12/2020 and 14/09/2020 respectively	No Comments

Place: Vijayawada

Date: 25.06.2021

UDIN: A035463C000514711

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

