

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

Date: 21th May, 2022

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 31.03.2022 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 31.03.2022 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, 2022

(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, 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 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	Reg. 33 (Financial Result) of SEBI (LODR) Regulation, 2015.	The Company filed the Financial Results for the quarter ended June 2021 with delay days.	<p>BSE vide email dated 14/09/2021 levied fine of 1,05,000/- excluding GST.</p> <p>The Company vide letter dated 26/02/2022 applied to BSE for waiver of the fine imposed for late compliance.</p> <p>The BSE intimated the company by email dated 06/05/2022 that the company's request for waiver of the fine has been approved by the "Internal Committee for Fine</p>



			Waiver".
--	--	--	----------

- 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	Nonpayment of SOP Fines for the late / noncompliance of Reg-23(9), for the quarter Sep-20, Reg-6(1) for the Quarter Dec-19, Reg-6(1) for the Quarter Jun-20, Reg-6(1) for the Quarter Sep-20, Reg-17(1) for the Quarter Sep-20 and Reg-18(1) for the Quarter Mar-19	Freezing of promoter DEMAT accounts	It is observed that BSE has continued the freezing of promoter DEMAT during the period also. The Company vide letter dated 26/02/2022 applied to BSE for waiver of the SOP fines imposed for late / noncompliance. Yet to get the waiver decision from BSE.

- 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	Regulation 6(1) of SEBI (LODR) Regulations, 2015 – Listed entity shall appoint a qualified CS as Compliance Officer	Appointed Company Secretary on 14/09/2020	Appointed Company Secretary	No Comments



2	Regulation 17(1) of SEBI (LODR) Regulations, 2015 – Composition of Board	Not appointed required number of Independent Directors till 14/09/2020	Appointed required number of Independent Directors	No Comments
---	--	--	--	-------------

Digitally signed
by Kode
Hemachand
Date: 2022.05.21
14:10:53 +05'30'

Sign.....

Kode Hemachand
Practicing Company Secretary
M No: A35463
CP No: 13416
UDIN: A035463D000360293

Place: Vijayawada
Date: 21.05.2022