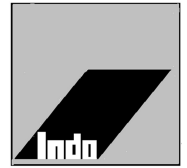




Regd. Office : Plot No. W -44, M.I.D.C. Phase II, Dombivli (E), Dist.
Thane 421203, Maharashtra. India.
Phone : +91 251 2871354 / 2870941 / 2873052 / 2873529
Fax : +91 251 2871635.
E-mail : shares@indoaminesltd.com
Website : www.indoaminesltd.com
CIN : L99999MH1992PLC070022

**INDO
AMINES
LIMITED**



Date: 30th May, 2022

To,
The Manager, Listing Department
National Stock Exchange of India Ltd.
Plot no. C/1G Block,
Bandra-Kurla Complex, Bandra (East),
Mumbai-400051
Symbol: INDOAMIN

To,
The General Manager, Listing Department
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai-400001
Script Code: 524648

Sub: Annual Secretarial Compliance Report for the year ended 31st March, 2022.

Dear Sir/ Madam,

In terms of Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, read with SEBI circular no. CIR/CFD/CMD1/27/2019 dated 8th February, 2019, Please find enclose herewith Annual Secretarial Compliance Report of the Company for the financial year ended 31st March, 2022.

This is for your information and record.

Thanking you.

Yours truly,
For, Indo Amines Limited

TRIPTI
MAHESH
SHARMA

Digitally signed
by TRIPTI
MAHESH
SHARMA

Tripti Sharma
Company Secretary & Compliance Officer
Mem: A39926

Encl: As above

AVS & ASSOCIATES

Company Secretaries (Peer Reviewed Firm)

Regd. Office: 1703, G-Square Business Park, Sector 30A, Near Sanpada Railway Station,
Sanpada, Navi Mumbai -400703, Maharashtra, India

Email: info@avsassociates.co.in

Tel: 022-35119443 /35119444

Secretarial Compliance Report of Indo Amines Limited for the year ended March 31, 2022

We, **AVS & Associates** have examined:

- a) All the documents and records made available to us and explanations provided by **Indo Amines Limited ("the Listed Entity" or "the Company")**,
- b) the filings/submissions made by the listed entity to the stock exchanges i.e. **BSE limited ('BSE')**,
- 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 **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 (**Not applicable to the Company during the review period**);
- 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 Company during the review period**);
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014/
Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021(**Not applicable to the Company during the review period**);

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Shashank Chintaman
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- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008/Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 **(Not applicable to the Company during the review period);**
- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013/Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 **(Not applicable to the Company during the review period);**
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- and circulars/guidelines issued thereunder applicable to the listed entity.

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 matter specified below:-

No	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1	As per Regulation 7(2) of SEBI (Prohibition of Insider Trading), Regulations 2015 every company shall notify the particulars of such trading to the stock exchange on which the securities are listed within two trading days of receipt of the disclosure or from becoming aware of such information.	Marvel Indenting Pvt. Ltd., Promoter Group Company has revoked (released) pledge of 60,000 equity shares held in the Company during the review period. The same was not intimated by the said promoter group to the Company as required under Reg.7(2)(a) of SEBI (PIT) Regulations, 2015.	Disclosures under Reg. 7(2)(a) of SEBI (Prohibition of Insider Trading) Regulations, 2015 was not received from Marvel Indenting Pvt. Ltd., the promoter group Company for revocation/release of pledge of 60,000 equity shares during review period. However, the Company has filed the said disclosure suo-moto to the stock exchanges in delay after review period.

- 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 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 during the review period:

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	Mr. Nishikant Sule has continued as Non-Executive Independent Director on the Board of Directors of the Company till June 2, 2021 without a special resolution being proposed & passed to that effect by the members of the Company under Regulation 17 (1A) of SEBI (LODR) Regulations, 2015.	BSE vide its emails dated June 2, 2021 & August 20, 2021 has imposed fine aggregating to Rs.200,000/- (excluding GST) for the quarters ended March 31, 2021 & June 30, 2021 on the Company for Non-Compliance of Reg. 17 (1A) of SEBI (LODR) Regulations, 2015 as well as sent reminder for freezing of promoters demat account in case of non-payment of fine.	Out of total amount of fine imposed, the company has paid fine of Rs.18,000/- (excluding GST) to BSE on June 4, 2021. Further, with respect to fine of Rs.180,000/- (excluding GST) imposed for the quarter ended June 30, 2021, the Company has asked for the necessary clarifications from BSE on which the Company is awaiting reply from BSE.

- d) The listed entity has taken the following actions to comply with the observations made in previous reports for the financial year ended March 31, 2021:

No.	Observations of the Practicing Company Secretary in the previous report for the year ended 31.3.2021	Observations made in the secretarial compliance report for the year ended 31.3.2021	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	Disclosures under Reg. 7(2)(a) of SEBI (Prohibition of Insider Trading) Regulations, 2015 not received from Marvel Indenting Private Limited, the promoter group Company for encumbrances of shares during audit period. However the	Disclosures under Reg. 7(2)(a) of SEBI (Prohibition of Insider Trading) Regulations, 2015 not received from Marvel Indenting Private Limited, the promoter group Company for encumbrances of shares during audit period. However	To comply with the Reg. 7(2) of SEBI (PIT) Regulations, 2015, the Company has taken necessary actions and filed disclosure suo-moto to the stock exchange. Further, necessary explanations was given by the	The Company has filed necessary disclosure under 7(2) of SEBI (PIT) Regulations, 2015 suo moto to BSE Limited. Further, explanations given by the Company in its board report for the year ended March 31, 2021 for the same be and is

	Company has filed the said disclosure suo-moto to the stock exchange.	the Company has filed the said disclosure suo-moto to the stock exchange.	Company in its Board Report for the year ended March 31, 2021 stating that, Marvel Indenting Private Limited ('Marvel') Promoter Group Company is taking its investment decisions independently. The Company was not aware about encumbrances of shares undertaken by Marvel and as soon as the company becomes aware from information by RTA, the company has filed requisites disclosures to the stock exchange immediately.	hereby noted by us.
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2	Mr. Nishikant Sule has continued as Non-Executive Independent Director on the Board of Directors of the Company till 31st March, 2021 without a special resolution being proposed & passed to that effect by the members of the Company under Regulation	Mr. Nishikant Sule has continued as Non-Executive Independent Director on the Board of Directors of the Company till 31st March, 2021 without a special resolution being proposed & passed to that effect by the members of the Company	Before taking any action the company had received resignation letter from Mr. Nishikant Sule for his cessation from the office of director of the Company w.e.f. 3 rd June, 2021 and the same has been intimated by the company to the stock exchange/ROC.	Before taking any action the company had received resignation letter from Mr. Nishikant Sule for his cessation from the office of director of the Company w.e.f. 3 rd June, 2021. Further, explanations given by the Company in its board report for the year ended March 31, 2021 for the same be and is hereby noted by us.
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	17 (1A) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	under Regulation 17 (1A) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	Further, the Company had also given necessary explanations in its board report for the year ended March 31, 2021.	
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Place: Navi Mumbai
Date: May 30, 2022

For AVS & Associates
Company Secretaries

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Chintaman
Ghaisas

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Chintaman Ghaisas
Date: 2022.05.30
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Shashank Ghaisas
Partner
Membership No: F11782
CP No: 16893
Peer Review No: 1451/2021
UDIN: F011782D000437108