

July 02, 2021

To,
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai – 400 001
Scrip Code: 526235

To,
National Stock Exchange of India Ltd.
Exchange Plaza, Plot no. C/1, G Block,
Bandra-Kurla Complex
Bandra (E), Mumbai - 400 051.
Scrip Code: MERCATOR

Dear Sir/Madam,

Sub: Annual Secretarial Compliance Report for the year ended March 31, 2021

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time, read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019, please find enclosed herewith the Annual Secretarial Compliance Report issued by M/s. Manish Ghia & Associates, Company Secretaries for the year ended March 31, 2021.

We request you to take the same on record.

Thanking You,

Yours faithfully,

For Mercator Limited

RAJENDRA
KUMAR
KOTHARI

Rajendra Kothari
Chief Financial Officer

Encl.: as above

Secretarial Compliance Report

of Mercator Limited for the year ended 31st March 2021

[pursuant to Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019]

To,
The Members,
Mercator Limited
Mumbai

We **Manish Ghia & Associates, Company Secretaries** have examined:

- (a) all the documents and records made available to us and explanation provided by **Mercator Limited** having Corporate Identification Number L63090MH1983PLC031418 and whose equity shares are listed at BSE Limited and National Stock Exchange of India Limited with Scrip Code/ Symbol of "526235" and "MERCATOR" respectively ("the company"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the company,
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31st March 2021 ("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 (LODR);
- (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 company during the review period)*;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 *(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 *(Not applicable to the company during the review period)*;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

and circulars/guidelines issued thereunder; and based on the above examination, We hereby report that, during the Review Period:

- (a) the company has complied with the provisions of the above Regulations and circulars/guidelines issued thereunder **except in respect of matters specified in Annexure-1 attached to this report**;
- (b) in view of our observations in clause (a) above wherein some of the records were not made available to us, *we are unable express the opinion* that the company has maintained proper records under the provisions of the above Regulations and circulars/guidelines issued thereunder;
- (c) the details of action taken against the company/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 is **as per Annexure-2** attached to this report; and



- (d) the company has taken actions to comply with the observations made in previous reports which are **as detailed out in Annexure-3** attached to this report.



Place: Mumbai
Date: July 2 , 2021
UDIN: F006252C000570741

For Manish Ghia & Associates
Company Secretaries
(Unique ID: P2006MH007100)

Mannish L. Ghia

CS Mannish L. Ghia
Partner
M. No. FCS 6252, C.P. No. 3531
PR 822/2020

NOTE:

On account various restrictions imposed by the Government Authorities on opening of offices, travel and movement due to Covid19 pandemic during the year under review, we for the purpose of completion of our audit have relied on documents and papers provided in electronic form through email/other virtual means for verification of compliances.



ANNEXURE 1

Sr. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
SEBI(Substantial Acquisition of Shares and Takeovers) Regulations, 2011			
1	Any Acquisition/Disposal of shares (change) by a person holding more than 5% shares in the company, and such change exceeds 2%, then disclosure under Regulation 29(2) of such change needs to be given to the company and the stock exchange within two working days of receipt of intimation of acquisition/disposal [Reg 29(2)]	Promoters have disposed off shares (invocation of pledge) exceeding the threshold specified in the regulation; however no intimation has been given to the company/stock exchange	Mr. Harish Mittal, Mrs. Archana Mittal and AHM Investments Private Limited, promoters of the company held more than 5% of the shares of the company and there is change in their shareholding during the quarter ended 30th June 2020 and such change exceeds 2%
2	Disclosure of Creation/Invocation/Release of encumbrance on shares by promoters to be made within 7 working days from the date of such creation/ invocation/release of encumbrance, to the company and the stock exchanges where shares of the company are listed. [Reg 31(3)]	The Promoters whose pledge (of shares) were invoked by the lenders have not given to the company and stock exchange the intimation of such invocation.	The Pledge of shares created by promoters have been invoked by the lenders on 2nd July 2020.
3	Annual Disclosure received from promoters relating to encumbered shares has to be placed before Audit Committee [Reg 31 (5)]	The said Annual disclosures received from promoters has not been placed before audit committee	On scrutiny of minutes of audit committee meeting it was concluded that no such disclosure was placed before the committee
SEBI (Prohibition of Insider Trading) Regulations, 2015			
4	Acquisition/Disposal of securities of the company by promoter, employee, director wherein aggregate of value of such transaction exceeds rupees ten lakh in one transaction or a series of transactions over any calendar quarter shall be disclosed within two trading days by such person to the company and subsequently company shall disclose such particulars of trading to the stock exchange within two trading days of receipt of the disclosure or from becoming aware of such information. [Reg 7(2A) & (2B)]	When the pledge of shares of Promoters were invoked by lenders, the value of such shares exceeded the threshold specified in the regulation; the intimation of such invocation (which would tantamount to disposal) requiring disclosure which were not given;	The promoter have not given the disclosure as required under the regulation 7(2A); however the company has also not given the disclosure under Reg 7(2B) upon becoming aware of the said disposal.
5	In case of declaration of financial results, the trading window closure shall commence on the last day of each quarter and the same has to be intimated to Stock Exchange [NSE Circular dated 2.4.2019 read with Para 4 of Sch B]	The Company has not announced closure of Trading Window for quarter ended 30th September 2020 to the stock exchanges	Trading Window was not closed by the company.

ANNEXURE 1

Sr. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
6	Designated persons and their immediate relatives shall not trade in securities when the trading window is closed. [Para 4 of Sch B]; Further any violations is required to be reported to the Stock Exchange promptly.	Promoters of the company have transacted in the securities of the company during the period when trading window was closed; further the company was required to report such violations to the Stock Exchanges.	Based on scrutiny of minutes of Audit Committee and the information provided by Company's RTA, it is noted that the promoter's have disposed of their shareholding in the company during the closure of trading window; however the exact number of shares that have been sold is not able to be ascertained in the absence of demat statement from the promoters as there have been decrease in shareholding due to invocation of pledge.
7	Due notice has to be given to persons (to whom Unpublished Price Sensitive Information is shared) to maintain confidentiality of Unpublished Price Sensitive Information shared to them pursuant to a legitimate purpose [Reg 3(2B)]	No record/support has been shown to us for verification of compliance.	We are unable to confirm compliance with the requirement.
8	The Board of Directors shall ensure that a structured digital database containing name of such persons or entities as the case may be with whom Unpublished Price Sensitive Information is shared, is maintained with adequate internal controls and checks including time stamping and audit trails to ensure non tampering. [Reg 3(5)]	The structured digital database is not maintained	The structured digital database is required to be maintained from 1.4.2019; In the previous year also this has been reported.
9	Every person on appointment as a director of the company shall disclose his holding of securities of the company within seven days of such appointment to the company [Reg 7(1)(b)]	Disclosure from person appointed as directors during the year regarding their security holding at the time of appointment not received.	Company has not been able to produce for our verification the disclosure, if any received in this regard from Mr. Jagmohan Talan, Mr. Sukhdarshan Bedi and Mrs. Ritu Vats on appointment as directors in the company



ANNEXURE 1

Sr. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
10	The Board of Directors shall ensure that Code of Conduct has been formulated to regulate, monitor and report trading by employees, and other connected persons (including fiduciaries) [Reg 9(1)]	The company is unable to produce the Code of Conduct for our verification	We are unable to confirm compliance with the requirement.
11	Company has to identify and designate a Compliance Officer for administering the Code of Conduct and other requirements [Reg 9(3)]	No record/support in this regard shown for our verification	We are unable to confirm compliance with the requirement.
12	The Board of Directors shall in consultation with Compliance Officer specify designated persons to be covered by the Code of Conduct [Reg 9(4)]	Board of Directors of the Company has not classified any persons as designated persons	Same as mentioned in "Deviations" column
13	The Audit Committee of the listed company shall review the compliance with the provisions of Regulations at least once in a financial year and also review that the control system are adequate and are operating effectively. [Reg 9A(4)]	The Audit Committee has not reviewed the said mandatory information	Based on our scrutiny of the minutes of meeting of Audit Committee, it is noted that no such review of compliances or control system has taken place.
14	The company shall formulate a board of directors approved written policies and procedures for inquiry in case of leak of Unpublished Price Sensitive Information or suspected leak of Unpublished Price Sensitive Information [Reg 9A(5)]	No record/support in this regard shown for our verification	We are unable to confirm compliance with the requirement.
15	Compliance Officer shall report to the Chairman of the Audit Committee or to the Chairman of the Board of Directors periodically [Para 1 of Schedule B]	No record/support in this regard shown for our verification	We are unable to confirm compliance with the requirement.
16	Trades executed by insiders shall be pursuant to the pre-clearance granted by the Compliance Officer where the value of trades is above such thresholds as stipulated by the Board in the Code [Para 6 of Schedule B]	No record/support in this regard shown for our verification	We are unable to confirm compliance with the requirement.
SEBI Circulars			
17	As per SEBI Circular no. SEBI/HO/CFD/CMD1/CIR/P/2019/140 dated 21st November 2019, Disclosure of defaults on payment of interest/ repayment of principal amount on loans from banks / financial institutions and unlisted debt securities has to be made within 7 days from the end of the Quarter.	Delay in Submission of the said disclosure for the quarter ended 31st March 2020; further the Company has not made the said disclosure for any subsequent quarters even though the default is continuing.	The Company has submitted the said disclosure for quarter ended 31st March 2020 on 19th May 2020; similar disclosures for subsequent quarters has not been made

ANNEXURE 1

Sr. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
18	As per Circular no. SEBI/HO/MIRSD/DOP1/ CIR/P/2018/73 dated 20 April 2018, Company has to place before Board of Directors Internal Audit Report and Action taken Report received from RTA	The said Report has not been placed before Board of Directors	Based on our scrutiny of the minutes of meetings of Board of Directors, we do not find any such Internal Audit Report having been placed before the Board.
19	As per SEBI Circular no. SEBI/HO/CFD/CMD1/CIR/P/2020/84 dated 20th May 2020 SEBI has mandated requirement to disclose the material impact of Covid19 on the business of the listed entity	The Company has not made the said disclosure	Company has not disclosed to the stock exchange(s) Impact of Covid-19 on the listed entity
20	As per SEBI Circular no. SEBI/HO/ISD/ISD/CIR/P/2019/82 dated 29th July 2019 Listed Company shall maintain a Database of violations by designated persons and their immediate relatives of code of conduct formulated under SEBI (Prohibition of Insider Trading) Regulations, 2015	The Database on violations is not maintained by company	Same as mentioned in "Deviations" column
SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015			
21	A listed entity shall appoint a qualified company secretary as the compliance officer. [Reg 6]	Company does not have a Compliance Officer	A Qualified Company Secretary is not a Compliance Officer throughout the year and till date; further the above default continues from the previous financial year.
22	The board of directors of the top 2000 listed entities shall comprise of not less than six directors; the company was in the top 2000 companies based on market capitalisation as on 31.3.2020. [Reg 17(1)(c)]	Company has only 4 Directors	the company is yet to comply with the requirement.
23	The listed entity shall submit within 30 days from the date of publication of its standalone and consolidated financial results for the half year, disclosures of related party transactions on a consolidated basis to the stock exchanges [Reg 23(9)]	the submission of the said disclosure for the half year ended 30th September 2020 was made beyond the stipulated time limit	The Company has submitted the said disclosure on 09.06.2021.
24	The Quarterly Report on Corporate Governance shall be signed either by the compliance officer or the chief executive officer of the listed entity. [Reg 27(2)(c)]	The Said Report has not been signed by person authorised in the said regulation	Quarterly report on Corporate Governance has been signed by Chief Financial Officer of the company



ANNEXURE 1

Sr. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
25	At least one independent director on the board of directors of the listed entity shall be a director on the board of directors of an unlisted material subsidiary, whether incorporated in India or not. [Reg 24(1)]	Non Appointment of Independent Director on the Board of unlisted material subsidiaries	The Company has not appointed its independent director on the board of its material subsidiaries; this default was also reported in the previous financial year.
26	Intimation regarding Board Meeting wherein financial results viz. quarterly, half yearly, or annual, to be discussed shall be given at least five days in advance (excluding the date of the intimation and date of the meeting) [Reg 29(2)]	The intimation has been given beyond the the stipulated timeline [delayed by one day]	Intimation for Board Meeting held on 15 July 2020 wherein Financial Results for year ended 31st March 2020 were approved, was given on 10.07.2020.
27	The listed entity shall submit the quarterly financial results to the Stock Exchanges, within 30 minutes of the closure of the meeting in which the same were approved [Reg 30 r/w Sch III Part A, Para A - 4(h)]	The submission of the Annual financial results for the year ended 31st March 2020 and Quarterly financial results for the quarter ended 31st December 2020 were made beyond the stipulated timeline.	Same as mentioned in "Deviations" column
28	The listed entity shall submit to the stock exchange(s) a statement showing shareholding pattern separately on a quarterly basis, within twenty one days from the end of each quarter. [Reg 31(1)(b)]	Submission of Shareholding pattern for the quarter ended 30th June 2020 was made beyond the stipulated timeline.	The shareholding pattern for the quarter ended 30th June 2020 was made on 24.07.2020 [delay of 3 days].
29	The listed entity shall disseminate prescribed information on its website. [Reg 46]	The Company has not disclosed such Mandatory information on its website including certain information under the SEBI (Prohibition of Insider Trading) Regulations, 2015 and SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; further the company is required to update the content within 2 days of any change therein;	Web Address of the company specified on BSE Website is not accessible; Company has an alternate web address and the same does not include mandatory information prescribed in the said regulation; further in view of the above, we are unable to ascertain compliance with regard to updation in the content
30	The evaluation of independent directors shall be done by the entire board of directors. [Reg 17(10)]	Evaluation of Independent Directors has not been done.	Based on scrutiny of the minutes of meetings of Board of Directors during the year, it is noted that no evaluation of independent directors has been done; The aforesaid default is also not disclosed in the directors report for the year 2019-20.



ANNEXURE 1

Sr. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
31	The nomination and remuneration committee shall meet at least once in a year. [Reg 19(3A)]	The Meeting of the committee of the company has not been held during the year	same as mentioned in "Deviations" column
32	The stakeholders relationship committee shall meet at least once in a year. [Reg 20(3A)]	The Meeting of the committee of the company has not been held during the year	same as mentioned in "Deviations" column
33	The risk management committee shall meet at least once in a year. [Reg 21(3A)]	The Meeting of the committee of the company has not been held during the year	same as mentioned in "Deviations" column
34	The audit committee of the listed entity shall also review the financial statements, in particular, the investments made by the unlisted subsidiary. [Reg 24(2)]	The Audit Committee of the Company has not reviewed the said mandatory Information of unlisted subsidiaries	The company has not placed before the Audit Committee of the mandatory particulars of the unlisted subsidiaries of the company
35	In case of resignation of the auditor of the listed entity, detailed reasons for resignation of auditor, as given by the said auditor, shall be disclosed by the listed entities to the stock exchanges within 24 hours of receipt of such reasons from the auditor. [Reg 30 r/w Sch III Part A, Para A - 7A]	the intimation and the mandatory particulars of resignation by Secretarial Auditor of the company have not been disclosed	Mr. Subhash Kishan Kandrapu, Practicing Company Secretary, appointed as Secretarial Auditor of the company resigned w.e.f 31st March 2021 by an email intimation; formal resignation letter has not been insisted upon or received by the company from the said auditor.
36	The minutes of the meetings of the board of directors of the unlisted subsidiary shall be placed at the meeting of the board of directors of the listed entity. [Reg 24(3)]	The said mandatory information has not been placed before Board of Directors of the Company	On scrutiny of minutes of meeting of Board of Directors of the Company it is noted that the minutes of board of directors of subsidiaries have not been placed before the board of the company.
37	The listed entity shall ensure that, for the purposes of quarterly consolidated financial results, at least eighty percent of each of the consolidated revenue, assets and profits, respectively, shall have been subject to audit or limited review, as the case may be. [Reg 33(3)(h)]	The Company has not complied with the said regulation in respect of financial results for the quarter ended 30th September 2020, 31st December 2020 and 31st March 2021.	The deviation is based on the reporting made by the Statutory Auditors in their respective reports.



ANNEXURE 1

Sr. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
38	Company is required to submit shareholding pattern on quarterly basis [Reg 33(1)]	None	Based on the information provided by RTA it is noted that there is a decrease in shareholding of promoters during the quarter April-June'2020; however the change has been reflected in July-September'2020 quarter which is due to invocation of pledge; the promoters have not provided us their demat statement to verify and reconcile the actual date of change to ascertain the correctness of the shareholding pattern submitted.
39	The Listed Entity shall disclose to stock exchange issuance of Notices sent to shareholders or advertised in the media by the listed entity. [Reg 30 r/w Sch III Part A, Para A - 12]	The Company has not Disclosed to Stock Exchange(s) notice sent to shareholders through Advertisement in newspaper	The Company has given notice to Shareholders for Annual General meeting through advertisement in newspaper, however the same has not been intimated/ submitted to stock exchange
40	The listed entity shall provide adequate and timely information to recognised stock exchange(s) and investors.[Reg 4(1)(d)]	Stock Exchange(s) has called upon the company to provide certain information relating to unclaimed shares to which the company is yet to respond.	The company has received first reminder on Nov 3, 2020, also physical letter was sent to company by registered post on November 10, 2020 in relation to compliance with Regulation 39(4) read with Schedule VI, however company has not replied to the same
41	Statement on status of redressal of Investor Grievances shall be placed on a quarterly basis before the board of directors [Reg 13(4)]	The said statement has not been placed before Board of Directors	Based on our scrutiny of the minutes of meetings of Board of Directors, we do not find any such statement having been placed before the Board.
42	The independent directors shall meet at least once in a year. [Reg 25(3)]	The Meeting of the Independent Directors of the company has not been held during the year	same as mentioned in "Deviations" column



ANNEXURE 1

Sr. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
43	Company shall formulate certain mandatory Policies	The company was unable to show the following policies for verification:- • Policy on Preservation of Documents [Reg 9] • Risk Management Plan [Reg 17(9)(b)] • Policy on materiality of events/information [Reg 30(4)(ii)] • Archival Policy [Reg 30(8)]	We are unable to confirm compliance with the requirement under respective regulation indicated in the previous column
44	The quarterly financial results approved by the board of directors shall be certified by the chief executive officer and chief financial officer of the listed entity. [Reg 33(2)(a)]	The chief executive officer and chief financial officer have not certified the quarterly financial results.	No proof/support shown to us for verifying the compliance; further no reference of having complied with this is also recorded in the minutes.
45	The listed entity shall familiarise the independent directors through various programmes about the listed entity [Reg 25(7)]	No record/support has been shown to us for verification of compliance.	We are unable to confirm compliance with the requirement.
46	Listed Entities shall file Voting Result in XBRL mode [Reg 44 read with BSE Circular no. DCS/COMP/20/2016-17 dated 18th January 2017]	The Company has not submitted the Voting Result of Annual General Meeting in XBRL mode	The Company has yet not filed Voting Result of Annual General Meeting held on 5th January 2021 in XBRL mode.



ANNEXURE 2

S.No.	Action taken by	Details of Violation	Details of action taken	Remarks
1	BSE Limited	Non Submission of statement on related party transaction for half year ended 30th September 2020	Fine of Rs.1.75 lacs imposed (excluding GST at applicable rates).	- the company has subsequently filed the RPT statement on 09.06.2021; and - Company is yet to remit the fine imposed by the stock exchange.
2	National Stock Exchange of India Limited; and BSE Limited	Non Appointment of Compliance Officer	Both the Stock Exchange have imposed a Fine of Rs.92000/- each (excluding GST at applicable rates)	- the Company is yet to appoint a Compliance Officer; and - the imposed fine is yet to be remitted to the stock exchange;
3	National Stock Exchange of India Limited	Delay in Submission of Financial Results for Quarter ended 31st March 2019	Fine of Rs.8.40 lacs imposed (excluding GST at applicable rates)	Company is yet to remit the fine to the stock exchange.



ANNEXURE 3

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended... (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	Company Secretary of the Company has resigned with effect from 23rd July, 2019 and till date the Company has not appointed Secretary, however a qualified Company Secretary is not a Compliance Officer till date	March 31, 2020	No Action taken	the default continues till date
2	With effect from 1st April, 2019 the company is required to maintain structured digital database in accordance with regulation; However the same is not in place during the year under review	March 31, 2020	No Action taken	the default continues till date
3	The company has submitted consolidated financial results for the financial year ended 31st March 2019 beyond 60 days from the end of the financial year	March 31, 2020	No further action is needed in the matter as the deviation is not rectifiable.	



ANNEXURE 3

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended... (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
4	The company has submitted consolidated financial results for the quarter ended 30th June 2019 beyond 45 days from the end of the financial year	March 31, 2020	No further action is needed in the matter as the deviation is not rectifiable.	
5	The company has not appointed its Independent Directors on the Board of its material subsidiaries	March 31, 2020	No Action taken	the default continues till date
6	A chart or matrix setting out skills of the board of directors of the Company under Schedule V is inadvertently missed out to include in the annual report for the year ended 31st March 2019	March 31, 2020	No further action is needed in the matter as the deviation is not rectifiable.	
7	Disclosure of relationships with the directors was not mentioned in the intimation given to the stock exchange for appointment of Ms. Ameeta Trehan	March 31, 2020	No further action is needed in the matter as the deviation is not rectifiable.	



ANNEXURE 3

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended... (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
8	Delay in submission of Reconciliation of Share Capital Audit Report for the quarter ended 30th June 2018 with NSE; Report submitted on August 18, 2018	March 31, 2019	No further action is needed in the matter as the deviation is not rectifiable.	

