

**SECRETARIAL COMPLIANCE REPORT OF
SINTERCOM INDIA LIMITED
FOR THE FINANCIAL YEAR ENDED 31ST MARCH 2023**

We have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by **Sintercom India Limited** (hereinafter referred as 'the listed entity'), having its Registered Office at Gat No.127, At Post Mangrul, Taluka Maval (Talegaon Dabhade) Pune Mh 410507/ The Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and to provide our observations thereon.

Based on our verification of the listed entity's books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Review, we hereby report that the listed entity has, during the review period covering the financial year ended on 31st March 2023, complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter :

We, KANJ & Co. LLP, Company Secretaries have examined:

- (a) all the documents and records made available to us, and explanation provided by **Sintercom India Limited** ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this report, for the financial year ended 31st March 2023 ("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;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021;
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021;
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; (other regulations as applicable) and circulars/ guidelines issued thereunder 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 matters specified below

Sr. No.	Compliance Requirement (Regulations/ circulars/guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/Remarks of the Practicing Company Secretary	Management Response	Remarks
1.	The notice being sent to shareholders for an annual general meeting, where the statutory auditor(s) is/are proposed to be (2) appointed/re-appointed shall include the following disclosures as a part of the explanatory statement to the notice: (a) Proposed fees payable to the statutory auditor(s) along with terms of appointment and in case of a new auditor, any material change in the fee payable to such auditor from that paid to the outgoing auditor along with the rationale for such change;	36(5)(a) of SEBI LODR 2015	The Explanatory Statement of 15 th Annual General Meeting of the listed entity held on 23 rd September 2022, does not provide for the details of proposed fees payable to the new auditors.	N/A	N/A	The Explanatory Statement of 15 th Annual General Meeting of the listed entity held on 23 rd September 2022, does not provide for the details of proposed fees payable to the new auditors.	N/A	<i>The Explanatory Statement of 15th Annual General Meeting of the listed entity held on 23rd September 2022, does not provide for the details of proposed fees payable to the new auditors and to that extent provisions of Regulation 36(5)(a) of SEBI LODR 2015 have not been complied with.</i>	As there was no difference in the amount of remuneration proposed to be paid to the new auditors vis a vis the remuneration paid to the retiring auditors and hence the remuneration was not specifically mentioned in the resolution passed at the 15th AGM of the Company	N/A



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