



**Secretarial Compliance Report of M/s. Jindal Photo Limited for the year  
Ended 31<sup>st</sup> March, 2021**

We have examined:

- (a) all the documents and records made available to us and explanation provided by Jindal Photo 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 certification,

For the year ended 31<sup>st</sup> March, 2021 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 (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- b) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- c) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- d) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

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.
- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far as it appears from our

examination of those records. However, the correctness of the records lies with the management.

(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.	NSE	As per Regulation 17 (1) of the SEBI (LODR) Regulation, 2015, the Board Composition did not have six members during the period from April 01, 2020 to May 03, 2020.	The stock exchange imposed the penalty of Rs. 1,65,000/- which was waived off vide letter no. NSE/LIST/SOP/0824 dated 17-11-2020.	As informed by the management, the violation was occurred due to outbreak threat of COVID-19 Pandemic and nationwide wide lockdown taken place in the country during that period.

*\*The information in the above mentioned table is based upon the Management Representation Certificate as received from the Company.*

**Place:** New Delhi  
**Date:** 27.05.2021

for **Grover Ahuja & Associates**  
**Company Secretaries**

**Akarshika Goel**  
**(Partner)**  
**ACS No.: 29525; C P No.: 12770**  
**UDIN: A029525C000376421**