



E.I.D. - Parry (India) Limited

Regd.Office : Dare House, 234,N.S.C. Bose Road, Parrys Corner, Chennai 600 001, India.

Tel : 91.44.25306789 Fax : 91.44.25341609 / 25340858

CIN : L24211TN1975PLC006989

Website : www.eidparry.com

May 30, 2022

National Stock Exchange of India Ltd
Exchange Plaza, 5th Floor
Plot No. C/1, G Block
Bandra-Kurla Complex
Bandra (E), Mumbai 400 051
Scrip Code: EIDPARRY

BSE Limited
1st Floor
New Trading Ring, Rotunda Building
P J Towers, Dalal Street Fort
Mumbai 400 001
Scrip Code No: 500125

Dear Sir/Madam,

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

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February 2019, please find enclosed the Annual Secretarial Compliance Report, issued by the Practicing Company Secretary, for the year ended March 31, 2022.

Kindly take the above information on record.

Yours faithfully

For E.I.D. - PARRY (INDIA) LIMITED


Biswa Mohan Rath
Company Secretary
Encl: a/a

Secretarial compliance report of E.I.D.-PARRY (INDIA) LIMITED for the year ended
31st March, 2022

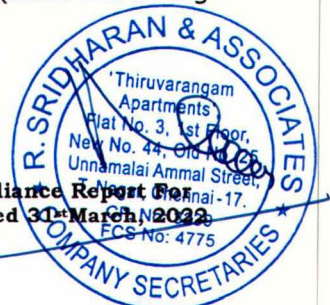
ISIN: INE126A01031

We, **R.SRIDHARAN & ASSOCIATES, Company Secretaries** have examined:

- a) All the documents and records made available to us and explanation provided by **E.I.D.-PARRY (INDIA) LIMITED (CIN: L24211TN1975PLC006989)** (hereinafter referred as **"the listed Entity"**) having its Registered office at **"Dare House", Parrys Corner, Chennai- 600001.**
- b) the filings/ submissions made by the listed entity to the stock exchanges,
- c) website of the listed entity, (website address: www.eidparry.com)
- d) any other document/ filing, as may be relevant, which has been relied upto make this certification, for the year ended **31st March 2022** 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 there under, have been examined, include:-

- a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended; (herein after referred to as ("SEBI(LODR) Regulations, 2015")
- b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **(Not applicable during the year under review)**
- 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 during the year under review)**
- e) Securities Exchange Board of India (Share Based Employee Benefits) Regulations, 2014), The Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulation, 2021 and Securities Exchange Board of India (Employee Stock Option Scheme and Employee Stock Purchase Scheme) Guidelines, 1999;
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008(up to 16th August, 2021) and Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities), Regulations, 2021;





Company Secretaries

- g) Securities and Exchange Board of India (Issue and listing of Non -Convertible and redeemable Preference shares) Regulations, 2013 (up to 16th August, 2021);
(Not applicable during the year under review)
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client; **(Not applicable as the Company is not registered as Registrar to an Issue and Share Transfer Agent during the year under review)**
- j) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 and circulars/guidelines issued there under;

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 there under:-

Sr. No	Compliance Requirement (Regulations/circulars/ guidelines including specific clauses)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	Regulation 30 (6) – Point 13 of Para A Part A of Schedule III of the SEBI(LODR) Regulations, 2015.- "Proceedings of the Annual General Meeting shall be disclosed to the Stock Exchanges within 24 hours from the conclusion of the meeting."	The Proceedings of the 46 th Annual General Meeting (AGM) held on 16 th September, 2021 was not filed within 24 hours from the conclusion of the Annual General Meeting.	As per the AGM Minutes, the meeting concluded at 5.00 pm and the proceedings were disclosed to National Stock Exchange of India Limited (NSE) on 17 th September 2021 at 07.08 pm and to BSE Limited (BSE) at 17 th September 2021 at 07.12 pm. As informed by the management, there were some technical internet connectivity issues while filing the AGM proceedings with BSE Listing Centre and NSE NEAPS Portal and hence there was a delay of about 2 hours.
2.	Regulation 31(1)(b) - Holding of specified securities and shareholding pattern of the SEBI (LODR)	The shareholding pattern submitted for the quarter ended December 2021 had not disclosed the details of the pledge of 1,25,0000	The Company voluntarily found out that it had inadvertently missed out to mention the





	Regulations, 2015. – “The listed entity shall submit to the stock exchange(s) a statement showing holding of securities and shareholding pattern separately for each class of securities, in the format specified by the Board from time to time on a quarterly basis, within twenty one days from the end of each quarter.”	shares created on November 29, 2021 by the promoter Ms. A A Alagammai (Ms. A A Alagammai & Ms. Lakshmi Ramaswamy holds on behalf of the Lakshmi Ramaswamy Family Trust)	pledge details while filing the shareholding pattern for the quarter ended December 2021 and hence the Company on its own conscience after obtaining the approval of NSE and BSE filed the revised Shareholding Pattern for the same on 12 th April 2022.
3.	Regulation 27 (2)(a)– Other corporate governance requirements.- “The listed entity shall submit a compliance report on Corporate Governance in the format as specified by the Board from time to time to the recognised stock exchanges within 21 days from the end of each quarter of the SEBI (LODR) Regulations, 2015.”	The Company has filed the Corporate governance report within 21 days from the end of the quarter ended March 2022 on 20 th April 2022. While filing the report, the date of the Risk management committee meeting held on 7 th February 2022 was not disclosed in corporate governance report.	The Company has held the Risk Management Committee meeting on February 7, 2022. The company has received a mail from the exchange on May 5, 2022 seeking clarification from the company and the same was appropriately replied by the company stating that the company had duly conducted two Risk Management Committee meetings during the FY 2021-22 on August 11, 2021 and February 7, 2022 respectively.

- (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:





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.
Nil*				

* No action taken against the Listed Entity / its promoters / directors and material unlisted subsidiaries incorporated in India.

(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
NOT APPLICABLE				

**FOR R.SRIDHARAN & ASSOCIATES
COMPANY SECRETARIES**



CS R.SRIDHARAN

C.P NO.3239

FCS.NO.4775

PR NO.657/2020

UIN: S2003TN063400

UDIN: F004775D000396144

PLACE : CHENNAI

DATE : 26TH MAY, 2022