



Date: 29.06.2021

The Secretary
BSE Limited
Phiroze Jeejeebhoy towers
Dalal Street
Mumbai-400001

Dear Sirs,

Subject: Annual Compliance Secretarial Report for the financial year ended 31st March 2021

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI circular No. CIR/CFD/CMD1/27/2019 dated 8th February 2019 and SEBI/HO/CFD/CMD1/CIR/P/2020/109 dated 25th June 2020, please find enclosed copy of Annual Secretarial Compliance Report dated 23rd June 2021 for the financial year 2020-21 issued by M/s Dhruvil M Shah & Co., Practising Company Secretaries.

Request you to take the same on record

Thanking you,

Yours truly,
For **Multibase India Limited**

 

Sunaina Goraksh
Company Secretary
Encl: As above

Multibase India limited



**SECRETARIAL COMPLIANCE REPORT OF
MULTIBASE INDIA LIMITED**

(For the year ended March 31, 2021)

Ref: 328/2021-22

To,
Multibase India Limited
CIN: L01122DD1991PLC002959
74/5 6, Daman Industrial Estate,
Kadaiya Village, NaniDaman,
Union Territory, DD 396210, India.

I, Dhrumil M Shah have examined:

- (a) all the documents and records made available to us and explanation provided by **Multibase India Limited** ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchange,
- (c) website of the listed entity,
- (d) other documents/ filings, which has been relevant and relied upon to issue this certification,

for the year ended March 31, 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;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **Not Applicable to the Company during the period under review.**
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (Buy-back of Securities) Regulations, 2018; **Not Applicable to the Company during the period under review.**

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- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **Not Applicable to the Company during the period under review.**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Not Applicable to the Company during the period under review.**
- (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 period under review.**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
and circulars/guidelines issued thereunder;

and based on the above examination and considering the relaxations granted by the Ministry of Corporate Affairs and Securities and Exchange Board of India warranted due to the spread of the COVID-19 pandemic, I hereby report that, during the review period:

- (a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued, except in respect of matters specified below:

Sr. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practising Company Secretary
Nil			

- (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 my examination of those records.
- (c) The following are the details of actions taken against the listed entity/ its promoters/directors/ ~~material subsidiary~~¹ either by SEBI or by Stock Exchange (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 Practising Company Secretary, if any.
Nil				

¹ The Company does not have any subsidiary.



- (d) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	Observations of the Practising Company Secretary in the previous reports	Observations made in the secretarial compliance report for the previous year	Actions taken by the listed entity, if any	Comments of the Practising Company Secretary on the actions taken by the listed entity.
Not applicable				

I further report that, there was no event of appointment/re-appointment/resignation of statutory auditor of the Company during the review period. In this regard, I report that the Company has complied with Circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019.

Place: Mumbai
Date: June 23, 2021



For Dhrumil M Shah & Co.
UDIN: F008021C000504990

Dhrumil M Shah
Practising Company Secretary
CP 8978; FCS 8021
PR 995/2020