



To
Corporate Relationship Department
BSE Limited
Phiroze Jeejeebhoy Tower,
Dalal Street,
Mumbai – 400 001

Scrip Code: **526169**

Dear Sir/Madam,

Ref: SEBI Circular No. CiR/CFD/CMD1/27/2019 dated February 8, 2019

Sub: Annual Secretarial Compliance Report of the Company for the year ended March 31, 2022 as required under Regulation 24(A) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

With reference to the subject captioned above, please find enclosed herewith the Annual Secretarial Compliance Report of the Company for the financial year ended March 31, 2022, in the prescribed format, issued by Dhruvil M. Shah & Co., Practicing Company Secretaries, Mumbai, Secretarial Auditors of the Company.

Kindly take the above on record and oblige.

Yours truly
For **Multibase India Limited**

Parmy Kamani
Company Secretary & Compliance Officer
Membership No: A27788

Multibase India limited



Ref No: 218/2022-23

**ANNUAL SECRETARIAL COMPLIANCE REPORT OF
MULTIBASE INDIA LIMITED**

(For the year ended March 31, 2022)

Under Reg 24A of SEBI (Listing Obligations and Disclosure Requirements)
Regulations, 2015 read with SEBI Circular no CIR/CFD/CMD1/27/2019 dated 08th
February 2019

To,
Multibase India Limited
CIN: L01122DD1991PLC002959
74/5 6, Daman Industrial Estate,
Kadaiya Village, Nani Daman,
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, 2022 ("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. The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;



- b. The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- c. The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; - **Not Applicable**
- d. The Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 and The Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; - **Not Applicable**
- e. The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009 and The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021; - **Not Applicable**
- f. The Securities and Exchange Board of India (Buy-back of Securities) Regulations, 2018; - **Not Applicable**
- g. The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- h. The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018; and
- i. The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008, The Securities and Exchange Board of India (Non-convertible Redeemable preference shares) Regulations, 2013 and The Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; - **Not Applicable**

and circulars / guidelines issued thereunder; and based on the above examination and considering the relaxations granted by the 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 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 my examination of those records.



- (c) During the review period no actions were taken against the listed entity/ its promoters/directors 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.
- (d) There were no observations made in previous Annual Secretarial Compliance Reports.

I further report that, during the review period, the Statutory Auditors M/s BSR & Co LLP resigned with effect from 12th August, 2021, to fill such casual vacancy the Company had appointed M/s Price Waterhouse LLP as Statutory Auditor to hold office till next Annual General Meeting of the Company. Subsequently M/s Price Waterhouse LLP was re-appointed as statutory auditor of the company for a term of 5 consecutive years at the Annual General Meeting dated 21th September, 2021. 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: 27th May 2022



For Dhrumil M Shah & Co.
UDIN: F008021D000413283

A handwritten signature in blue ink, appearing to read "Dhru" followed by a stylized flourish.

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