

2.	Regulation 18, 19, 20 and 21 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.	Provisions pertaining to the Composition and constitution of the Committees were not complied by the Company	Due to the shortfall of the Independent Directors on the Board from 16 th July 2021 to 30 th November 2021, there was no proper composition of the Committees on the Board. The committees were properly constituted after the appointment of the Independent Directors on the Board of the Company by Government of India.
3.	Regulation 17(10) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.	The evaluation of Independent Directors has not done by the entire Board of Directors of the Company.	In compliance to the Regulation 17(10) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 the Company has not carried out the performance evaluation of the Independent Directors of the Company during the period under review, as Independent Directors are appointed by the Government of India.
4.	Regulation 19(4) read with Schedule II Part D (A) of the Securities and Exchange Board of India (Listing obligations and Disclosure Requirements) Regulations, 2015	The required policies /criteria were not formulated by the Company.	As the appointment of Directors are made by the Government of India and as informed by the Company, the evaluation of Directors is also made by the Government of India.
5.	Regulation 25(6) of the Securities and Exchange Board of India (Listing obligations and Disclosure	Provisions pertaining to independent directors were not complied, as on 31 st March 2022, the posts of 2 Independent Director	On the matter, the Company has informed that since the appointment has to be made by the concerned administrative department of the Government of

Requirements) Regulations, 2015.	lying vacant were not filed within 3 months from the date of vacancies.	India, various requests, reminders, intimations etc. has already been made to the ministry.
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- 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 Compliance with the provisions of Clause 6 (A) and 6 (B) of the Circular CIR/CFD/CMD1/114/2019 dated October 18, 2019 issued by the Securities and Exchange Board of India is not applicable since the Statutory Auditors were appointed by C&AG.
- d) 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.	National Stock Exchange and Bombay Stock Exchange	Non-compliance with the provisions of Regulations 17(1) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.	Fine of Rs. 5,36,900/- has been imposed by both NSE and BSE through a letter/e-mail dated 20 th August 2021.	As power of appointment independent directors are vested with the Government of India and compliance was not within the powers of the Board of Directors, a request has been made to both the Stock Exchanges for waiver of the Penalty.
2.	National Stock Exchange and Bombay Stock Exchange	Non-compliance with the provisions of Regulations 17(1) and 17(2A) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.	Imposition of fine of Rs. 5,90,000/- by both NSE and BSE through a letter/e-mail	As power of appointment independent directors are vested with the Government of India and compliance was not within the powers of the Board of



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			dated 22 nd November, 2021	Directors, a request has been made to both the Stock Exchanges for waiver of the Penalty.
3.	National Stock Exchange and Bombay Stock Exchange	Non-compliance with the provisions of Regulations 17(1), 17(2A), 18(1), 19(1), 19(2), 20, 21 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.	Imposition of fine of Rs. 13,92,400/- by both NSE and BSE through a letter/e-mail dated 21 st February, 2022	As power of appointment independent directors are vested with the Government of India and compliance was not within the powers of the Board of Directors, a request has been made to both the Stock Exchanges for waiver of the Penalty.

e) 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
I.	The Board of Directors does not consist of a Independent Woman Director in accordance with the Regulation 17 (1)(a) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.	31 st March, 2021	As informed by the Company, the Company has communicated to the Government of India for appointment of Independent Women Director from time to time. And as per the request of the Company, the Government of India	As informed by the Company, the Company has communicated to the Government of India for appointment of Independent Women Director from time to time. And as per the request of the Company, the Government of India



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			<i>has appointed a Woman Independent Director on the Board of the Company w.e.f. 7th day of December, 2021.</i>	<i>has appointed a Woman Independent Director on the Board of the Company.</i>
2.	<i>The Board of Directors does not have requisite number of Independent Directors on the Board of Company during the period 28th August, 2020 to 31st March, 2021 in compliance with the Regulation 17(1)(b) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.</i>	31 st March, 2021	<i>As informed, the listed entity is a Government Company and the Directors including the Independent Directors of the listed entity are appointed by the concerned ministry of Government of India.</i>	<i>As informed, the listed entity is a Government Company and the Directors including the Independent Directors of the listed entity are appointed by concerned ministry of Government of India.</i>
3.	<i>The evaluation of Independent Directors has not been done by the entire Board of Directors in terms of Regulation 17(10) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.</i>	31 st March, 2021	No Action taken	<i>As informed, the listed entity has not carried out the performance evaluation of the Independent Directors of the listed entity during the review period, as Independent Directors are appointed by the Government of India.</i>
4.	<i>The required policies/criteria were not formulated as mentioned</i>	31 st March, 2021	No Action taken	<i>As appointment of Directors are made by the Government</i>



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<i>in the Regulation 19(4) read with Schedule II Part D(A) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.</i>			<i>of India, accordingly, evaluation of Directors is done by the Government of India</i>
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Place: Noida
Date: 25.05.2022

For J. K. Gupta & Associates



J. K. Gupta

Jitesh Gupta
(Company Secretary)
FCS No.: 3978
C P No.: 2448
UDIN:- F003978D000387231