

KPL/2022-23/BSE  
24.05.2022



<b>Bombay Stock Exchange Ltd. Phiroze Jeejeebhoy Towers 25<sup>th</sup> Floor, Dalal Street MUMBAI - 400 001</b>	<b>National Stock Exchange of India Ltd. Exchange Plaza, 5<sup>th</sup> floor, Plot No. C/1, G Block, Bandra Kurla Complex Bandra (E) MUMBAI - 400 051</b>
<b>Scrip Code : 530299</b>	<b>Symbol : KOTHARIPRO</b>

**Sub : SECRETARIAL COMPLIANCE REPORT**

Dear Sir,

Pursuant to Regulation 24A of SEBI (LODR) Regulations, 2015 & SEBI circular CIR/CFD/CMD1/27/2019 dated 08. February, 2019, we are attaching herewith the Secretarial Compliance Report of the Company for the Financial Year ended 31st March, 2022 issued by M/s Adesh Tandon & Associates, Kanpur.

Kindly take the same on record.

Thanking you,

Yours Faithfully  
For KOTHARI PRODUCTS LTD.

A handwritten signature in black ink, appearing to be 'Raj Kumar Gupta', written over a circular stamp or seal.

(RAJ KUMAR GUPTA)  
CS & COMPLIANCE OFFICER  
FCS - 3281

Encl : As above

**Regd. Off. :** " Pan Parag House", 24/19, The Mall, Kanpur - 208 001 (INDIA)  
Phone : +91 512 2312171-72-73-74 • Fax: +91 512 2312058

E-mail: [kothari@panparag.com](mailto:kothari@panparag.com)

CIN No - L 16008 UP 1983 PLC 006254 [info@kothariproducs.in](mailto:info@kothariproducs.in)

**ADESH TANDON & ASSOCIATES**  
**COMPANY SECRETARIES**

**Adesh Tandon**

FCS, LL.B., B.Com., AAIMA

811, 8<sup>th</sup> Floor, KAN Chambers,  
14/113, Civil Lines, Kanpur – 208 001 (U.P.)  
**Tel.:** 0512 – 2332397, **Mobile:** +91-9839100709  
**E-mail:** adesh.tandon11@gmail.com

**Secretarial Compliance Report**

For the Financial Year ended March 31, 2022

To,

**Kothari Products Limited**

Pan Parag House, 24/19,

The Mall, Kanpur, U.P. – 208001

I, Adesh Tandon, proprietor of Adesh Tandon & Associates, Company Secretaries, Kanpur have examined:

- (a) all the documents and records made available to us and explanation provided by **Kothari Products Limited** (hereinafter referred to as “the Listed Entity”) bearing CIN: L16008UP1983PLC006254 and having its registered office at PAN PARAG HOUSE 24/19 THE MALL KANPUR UTTAR PRADESH UP 208001,
- (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 March 31, 2022 (hereinafter referred as “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

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TANDON

Digitally signed by  
ADESH TANDON  
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**ADESH TANDON & ASSOCIATES**  
**COMPANY SECRETARIES**

**Adesh Tandon**

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**E-mail:** adesh.tandon11@gmail.com

- (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 according to their applicability during the Review Period, include:

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulation")
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 **(Not applicable to the Company during the Review Period);**
- (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 to the Company during the Review Period);**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 **(Not applicable to the Company during the Review Period);**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 **(Not applicable to the Company during the Review Period);**
- (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 Review Period);**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

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**COMPANY SECRETARIES**

**Adesh Tandon**

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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 insofar as it appears from my examination of those records.
- (c) As informed to us, there are no 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.
- (d) The management had already dealt with the observation made in the previous report.

**For ADESH TANDON & ASSOCIATES**  
**Company Secretaries**

**UDIN: F002253D000375494**

Date: May 24, 2022

Place: Kanpur

ADESH  
TANDON

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ADESH TANDON  
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**(Adesh Tandon)**  
Proprietor  
FCS No. 2253  
C.P. No. 1121