



**Orient Abrasives Limited**

Ref No.: Orient/Stock Exch/Letter/303

30<sup>th</sup> May, 2022

The Dy. General Manager,  
Corporate Relations & Services Dept.,  
Bombay Stock Exchange Limited  
P. J. Towers, Dalal Street,  
Mumbai - 400 023.

The Dy. Gen. Manager,  
National Stock Exchange of India Ltd.,  
Corporate Relations Dept.,  
Exchange Plaza, Bandra-Kurla Complex,  
Bandra (E), Mumbai - 400 051.

**Scrip Code: 504879**

**Scrip Code: ORIENTABRA**

Dear Sir/Madam,

**Sub.: Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March, 2022.**

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we are submitting herewith the Annual Secretarial Compliance Report of the Company for the year ended 31<sup>st</sup> March, 2022, issued by Ms. Dipti Gohil, Practicing Company Secretary.

Kindly take the above on record.

Thanking You,

Yours faithfully,

**FOR ORIENT ABRASIVES LIMITED**

**SEEMA SHARMA  
COMPANY SECRETARY & COMPLIANCE OFFICER**

Encl: As above



DIPTI GOHIL

PRACTISING COMPANY SECRETARY

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403, Vasant Vaibhav CHS, M. G. Cross Road No.4,  
Kandivali (W), Mumbai – 400067  
Mob: 9819606720 Email: diptigl@gmail.com

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**SECRETARIAL COMPLIANCE REPORT OF ORIENT ABRASIVES LIMITED**  
**FOR THE YEAR ENDED 31<sup>ST</sup> MARCH, 2022**

I, Dipti Gohil, have examined:

- a) all the documents and records made available to me and explanation provided by ORIENT ABRASIVES LIMITED having CIN L24299MH1971PLC366531 (“the Listed Entity”) arising from the compliances of specific Regulations listed under Clause 2 of this Report,
- b) the filings/ submissions made by the Listed Entity to the Stock Exchanges,
- c) website of the Listed Entity,
- d) any other document/ filing / submission, as may be relevant, which has been relied upon to make this certification,

for the financial 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) 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 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 during the Review Period** -
- e) 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 during the Review Period** -

Contd...2.

- f) The Securities and Exchange Board of India ( Issue and Listing of Debt Securities ) Regulations 2008, The Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 and The Securities and Exchange Board of India ( Issue and Listing of Non Convertible Securities ) Regulations, 2021; - **Not Applicable during the Review Period** -
- g) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- h) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- i) SEBI (Registrars to an Issue and Share Transfer Agents) Regulations 1993, regarding the companies Act, and dealing with the client.

and based on the above examination, 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 except in respect of the following matter :

Sr. No.	Compliance Requirements [ Regulations / circulars /guidelines ]	Deviations	Observations ( Remarks)
1.	Trading activity not to be undertaken during the closure of Trading Window by the Designated Persons –  [ Schedule B of the SEBI (Prohibition of Insider Trading) Regulations, 2015 ]	Transactions during the said period.	The Designated Person/ Director of the Company has traded in securities of the Company during the said period. Under the instructions of the Audit Committee warning letters have been issued to him.  <i>The Company has clarified, that the approvals / permission for the said trading activity had been taken well in advance. However, due to miscommunication with the Broker the actual trading took place during the period of closure of trading window.</i>

- 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) No action has been 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 Listed entity has taken the following actions to comply with the observations made in previous Report. -**N.A. being no observations made in the previous Report** –
- e) I have partially conducted online verification and examination of records, as facilitated by the Company due to prevailing conditions owing to Covid-19 for the purpose of issuing this Report

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.

DIPTI  
NARENDRA  
GOHIL

Digitally signed by DIPTI NARENDRA GOHIL  
DN: c=IN, o=Personal,  
pseudonym=cde358067f005fc12f2e9fc2025  
e8dd86cab8930ed4cc8e6435ce946a2551e0,  
postalCode=400067, st=MAHARASHTRA,  
serialNumber=9c93261e090c35191532eed08  
a2db8273dd2e140688f42f2fc60553d88e6db  
4f, cn=DIPTI NARENDRA GOHIL  
Date: 2022.05.30 20:29:11 +05'30'

**Dipti Gohil**  
**ACS – 14736**  
**CP - 11029**

Peer Review Certificate No. : 2026/2022

Date : 30<sup>th</sup> May, 2022

Place : Mumbai

UDIN : A014736D000429414