

K. GULGULIA & CO.
Company Secretaries

Secretarial compliance report of INTERNATIONAL CONVEYORS LIMITED
for the year ended 31st March, 2022

We K.GULGULIA & CO have examined:

- (a) All the documents and records made available to us and explanation provided by **INTERNATIONAL CONVEYORS LIMITED**("the listed entity"),
- (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 31st March, 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; **(there were no events requiring compliance 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; **(there were no events requiring compliance during the review period);**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(there were no events requiring compliance during the review period);**
- (g) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013; **(there were no events requiring compliance during the review period);**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

and circulars/ guidelines issued thereunder;

and based on the above examination, I hereby report that, during the Review Period:

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

Sr.No	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
NONE			

- (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/our examination of those records.
- (c) 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.	Securities & Exchange Board of India	On 29.06.2009, the Company had announced audited financial results for quarter and year ended 31.03.2009 and final dividend was declared on 30.06.2009 for the FY 2008-09, the trading window of the Company should have been closed till 01.07.2009 but it was actually closed till 30.06.2009 i.e. Trading Window was opened 24 hours earlier than required and Shri R. K. Dabriwala, Promoter and Managing Director of the Company had acquired 6,895 shares during the period 18.06.2009 to 30.06.2009 for Rs. 16,83,011.47 in total while in possession of unpublished price sensitive information.	Hon'ble Securities and Appellant Tribunal vide its order dated 05.07.2021 imposed a penalty of Rs. 12,00,000/- for violation of SEBI (Prohibition of Insider Trading) Regulation, 2015.	The penalty levied had been duly paid off by Shri R. K. Dabriwala, Promoter and Managing Director of the Company.

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(d) 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... <i>(The years are to be mentioned)</i>	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
NOT APPLICABLE				

For K. Gulgulia & Co
Company Secretaries
CoP No. 24240

Khushboo Gulgulia

Khushboo Gulgulia
Proprietor
Membership No.: 62099

UDIN: **A062099D000353181**



Place: Kolkata
Dated: 20th May, 2022