

| General information about company | |
|--|--------------------------|
| Scrip code | 532731 |
| NSE Symbol | ROHITFERRO |
| MSEI Symbol | NOTLISTED |
| ISIN | INE248H01012 |
| Name of the entity | ROHIT FERRO-TECH LIMITED |
| Date of start of financial year | 01-04-2020 |
| Date of end of financial year | 31-03-2021 |
| Reporting Quarter | Yearly |
| Date of Report | 31-03-2021 |
| Risk management committee | Not Applicable |
| Market Capitalisation as per immediate previous Financial Year | Any other |

| Annexure I | | | | | | | | | | | | | | | | | | | | |
|--|-----------------|-----------------------|------------|----------|--|-------------------------|-------------------------|---------------|---|------------------------------------|-----------------------------|------------------------|-------------------|--------------------------------|--|---|---|--|-----------------------------|-----------------------------|
| Annexure I to be submitted by listed entity on quarterly basis | | | | | | | | | | | | | | | | | | | | |
| I. Composition of Board of Directors | | | | | | | | | | | | | | | | | | | | |
| Disclosure of notes on composition of board of directors explanatory | | | | | | | | | | | | | | Textual Information(1) | | | | | | |
| Wether the listed entity has a Regular Chairperson | | | | | | | | | | | | | | No | | | | | | |
| Whether Chairperson is related to MD or CEO | | | | | | | | | | | | | | No | | | | | | |
| Sr | Title (Mr / Ms) | Name of the Director | PAN | DIN | Category 1 of directors | Category 2 of directors | Category 3 of directors | Date of Birth | Whether special resolution passed? [Refer Reg. 17(1A) of Listing Regulations] | Date of passing special resolution | Initial Date of appointment | Date of Re-appointment | Date of cessation | Tenure of director (in months) | No of Directorship in listed entities including this listed entity (Refer Regulation 17A of Listing Regulations) | No of Independent Directorship in listed entities including this listed entity (Refer Regulation 17A(1) of Listing Regulations) | Number of memberships in Audit/ Stakeholder Committee(s) including this listed entity (Refer Regulation 26(1) of Listing Regulations) | No of post of Chairperson in Audit/ Stakeholder Committee held in listed entities including this listed entity (Refer Regulation 26(1) of Listing Regulations) | Notes for not providing PAN | Notes for not providing DIN |
| 1 | Mr | SURESH KUMAR PATNI | AESPP2029L | 00032674 | Non-Executive - Non Independent Director | Not Applicable | | 13-07-1959 | NA | | 07-04-2000 | 27-08-2007 | | 251 | 1 | 0 | 1 | 0 | | |
| 2 | Mr | ANKIT PATNI | AJWPP2920M | 00034907 | Executive Director | Not Applicable | MD | 13-01-1985 | NA | | 30-09-2015 | 29-08-2019 | | 66 | 1 | 0 | 0 | 0 | | |
| 3 | Mr | RANJEET KUMAR BURNWAL | AHKPB3056E | 07479341 | Executive Director | Not Applicable | | 08-01-1967 | NA | | 24-03-2016 | 24-03-2019 | | 60 | 1 | 0 | 0 | 0 | | |
| 4 | Mrs | SUJATA AGARWAL | AKXPA1423C | 06833458 | Non-Executive - Independent Director | Not Applicable | | 22-11-1979 | NA | | 02-12-2014 | 02-12-2019 | | 75 | 3 | 3 | 5 | 4 | | |

I. Composition of Board of Directors

Disclosure of notes on composition of board of directors explanatory

Wether the listed entity has a Regular Chairperson

| Sr | Title (Mr / Ms) | Name of the Director | PAN | DIN | Category 1 of directors | Category 2 of directors | Category 3 of directors | Date of Birth | Whether special resolution passed? [Refer Reg. 17(1A) of Listing Regulations] | Date of passing special resolution | Initial Date of appointment | Date of Re-appointment | Date of cessation | Tenure of director (in months) | No of Directorship in listed entities including this listed entity (Refer Regulation 17A of Listing Regulations) | No of Independent Directorship in listed entities including this listed entity (Refer Regulation 17A(1) of Listing Regulations) | Number of memberships in Audit/ Stakeholder Committee(s) including this listed entity (Refer Regulation 26(1) of Listing Regulations) | No of post of Chairperson in Audit/ Stakeholder Committee held in listed entities including this listed entity (Refer Regulation 26(1) of Listing Regulations) | Notes for not providing PAN | Notes for not providing DIN |
|----|-----------------|----------------------|------------|----------|--------------------------------------|-------------------------|-------------------------|---------------|---|------------------------------------|-----------------------------|------------------------|-------------------|--------------------------------|--|---|---|--|-----------------------------|-----------------------------|
| 5 | Mr | SHARAT MALIK | AEUPM4121J | 08529458 | Non-Executive - Independent Director | Not Applicable | | 09-08-1968 | NA | | 14-08-2019 | 14-08-2019 | | 19 | 3 | 3 | 2 | 1 | | |
| 6 | Mr | ANKIT RUNGTA | ACTPR0588H | 06893793 | Non-Executive - Independent Director | Not Applicable | | 24-09-1984 | NA | | 02-12-2014 | 02-12-2019 | | 75 | 1 | 1 | 1 | 0 | | |
| 7 | Mr | ANKIT JAIN | AICPJ1998E | 07672255 | Non-Executive - Independent Director | Not Applicable | | 04-08-1988 | NA | | 14-12-2016 | 14-12-2016 | | 51 | 2 | 2 | 2 | 1 | | |

Text Block

| | |
|------------------------|--|
| Textual Information(1) | <p>The National Company Law Tribunal (NCLT), Kolkata Bench, vide order dated 7th February, 2020 in Company Petition No. 1214/KB/2018 has initiated CIRP under Section 7 of the Insolvency and Bankruptcy Code, 2016. Mr Supriyo Kumar Chaudhuri (IP Registration No. IBBI/IPA-001/IP-P00644/2017-18/11098) was appointed as IRP to manage affairs of the Company in accordance with the provisions of the Code. He was later on confirmed as RP by Committee of Creditors at their 1st meeting held on 5th March, 2020.</p> <p>Mr. Ankit Rungta and Mr. Ankit Jain, Independent Directors have placed their resignations before the Company w.e.f. 7th March, 2020, Mrs. Sujata Agarwal, Independent Director has placed her resignation before the Company w.e.f. 29th May, 2020 and Mr. Sharat Malik, Independent Director has also placed his resignation before the Company w.e.f. 20th July, 2020. The same were put up before CoC by RP. However, none of the resignations were approved by CoC.</p> |
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Annexure 1

II. Composition of Committees

Disclosure of notes on composition of committees explanatory

Textual Information(1)

Annexure 1 Text Block

| | |
|------------------------|---|
| Textual Information(1) | Mr. Ankit Rungta and Mr. Ankit Jain, Independent Directors have placed their resignations before the Company w.e.f. 7th March, 2020, Mrs. Sujata Agarwal, Independent Director has placed her resignation before the Company w.e.f. 29th May, 2020 and Mr. Sharat Malik, Independent Director has also placed his resignation before the Company w.e.f. 20th July, 2020. The same were put up before CoC by RP. However, none of the resignations were approved by CoC. |
|------------------------|---|

| Audit Committee Details | | | | | | | |
|---|------------|---------------------------|--------------------------------------|-------------------------|---------------------|-------------------|------------------------|
| Whether the Audit Committee has a Regular Chairperson | | | | | No | | |
| Sr | DIN Number | Name of Committee members | Category 1 of directors | Category 2 of directors | Date of Appointment | Date of Cessation | Remarks |
| 1 | 07672255 | ANKIT JAIN | Non-Executive - Independent Director | Chairperson | 14-12-2016 | | Textual Information(1) |
| 2 | 06833458 | SUJATA AGARWAL | Non-Executive - Independent Director | Member | 02-12-2014 | | Textual Information(2) |
| 3 | 06893793 | ANKIT RUNGTA | Non-Executive - Independent Director | Member | 02-12-2014 | | Textual Information(3) |

| Sr Text Block | |
|------------------------|---|
| Textual Information(1) | Mr. Ankit Jain, Independent Director has placed his resignation before the Company w.e.f. 7th March, 2020 but the same was rejected by the CoC. |
| Textual Information(2) | Mrs. Sujata Agarwal, Independent Director has placed her resignation before the Company w.e.f. 29th May, 2020 but the same was rejected by the CoC. |
| Textual Information(3) | Mr. Ankit Rungta, Independent Director has placed his resignation before the Company w.e.f. 7th March, 2020 but the same was rejected by the CoC. |

| Nomination and remuneration committee | | | | | | | |
|---|------------|---------------------------|--------------------------------------|-------------------------|---------------------|-------------------|------------------------|
| Whether the Nomination and remuneration committee has a Regular Chairperson | | | | | No | | |
| Sr | DIN Number | Name of Committee members | Category 1 of directors | Category 2 of directors | Date of Appointment | Date of Cessation | Remarks |
| 1 | 06893793 | ANKIT RUNGTA | Non-Executive - Independent Director | Chairperson | 02-12-2014 | | Textual Information(1) |
| 2 | 07672255 | ANKIT JAIN | Non-Executive - Independent Director | Member | 14-12-2016 | | Textual Information(2) |
| 3 | 08529458 | SHARAT MALIK | Non-Executive - Independent Director | Member | 14-08-2019 | | Textual Information(3) |

| Sr Text Block | |
|------------------------|---|
| Textual Information(1) | Mr. Ankit Rungta, Independent Director has placed his resignation before the Company w.e.f. 7th March, 2020 but the same was rejected by the CoC. |
| Textual Information(2) | Mr. Ankit Jain, Independent Director has placed his resignation before the Company w.e.f. 7th March, 2020 but the same was rejected by the CoC. |
| Textual Information(3) | Mr. Sharat Malik, Independent Director has placed his resignation before the Company w.e.f. 20th July, 2020 but the same was rejected by the CoC. |

| Stakeholders Relationship Committee | | | | | | | |
|---|------------|---------------------------|--|-------------------------|---------------------|-------------------|------------------------|
| Whether the Stakeholders Relationship Committee has a Regular Chairperson | | | | | No | | |
| Sr | DIN Number | Name of Committee members | Category 1 of directors | Category 2 of directors | Date of Appointment | Date of Cessation | Remarks |
| 1 | 06833458 | SUJATA AGARWAL | Non-Executive - Independent Director | Chairperson | 02-12-2014 | | Textual Information(1) |
| 2 | 00032674 | SURESH KUMAR PATNI | Non-Executive - Non Independent Director | Member | 30-05-2014 | | |
| 3 | 08529458 | SHARAT MALIK | Non-Executive - Independent Director | Member | 14-08-2019 | | Textual Information(2) |

Sr Text Block

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|------------------------|---|
| Textual Information(1) | Mrs. Sujata Agarwal, Independent Director has placed her resignation before the Company w.e.f. 29th May, 2020 but the same was rejected by the CoC. |
| Textual Information(2) | Mr. Sharat Malik, Independent Director has placed his resignation before the Company w.e.f. 20th July, 2020 but the same was rejected by the CoC. |

| Risk Management Committee | | | | | | | |
|---|------------|---------------------------|-------------------------|-------------------------|---------------------|-------------------|---------|
| Whether the Risk Management Committee has a Regular Chairperson | | | | | | | |
| Sr | DIN Number | Name of Committee members | Category 1 of directors | Category 2 of directors | Date of Appointment | Date of Cessation | Remarks |

| Corporate Social Responsibility Committee | | | | | | | |
|---|------------|---------------------------|--|-------------------------|---------------------|-------------------|------------------------|
| Whether the Corporate Social Responsibility Committee has a Regular Chairperson | | | | | No | | |
| Sr | DIN Number | Name of Committee members | Category 1 of directors | Category 2 of directors | Date of Appointment | Date of Cessation | Remarks |
| 1 | 06833458 | SUJATA AGARWAL | Non-Executive - Independent Director | Chairperson | 02-12-2014 | | Textual Information(1) |
| 2 | 00032674 | SURESH KUMAR PATNI | Non-Executive - Non Independent Director | Member | 07-05-2014 | | |
| 3 | 07479341 | RANJEET KUMAR BURNWAL | Executive Director | Member | 30-05-2016 | | |

Sr Text Block

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|------------------------|---|
| Textual Information(1) | Mrs. Sujata Agarwal, Independent Director has placed her resignation before the Company w.e.f. 29th May, 2020 but the same was rejected by the CoC. |
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| Other Committee | | | | | | |
|-----------------|------------|---------------------------|-------------------------|-------------------------|-------------------------|---------|
| Sr | DIN Number | Name of Committee members | Name of other committee | Category 1 of directors | Category 2 of directors | Remarks |

Annexure 1

Annexure 1

III. Meeting of Board of Directors

| | | |
|--|--|------------------------|
| Disclosure of notes on meeting of board of directors explanatory | | Textual Information(1) |
| Text Block | | |
| Textual Information(1) | <p>In consonance with the stipulation contained in Section 17, 18 and 20 of the IBC, 2016, the powers of the Board of Directors and its Committees stand suspended and the same are vested with and exercised by Resolution Professional.</p> <p>However there was one meeting of Resolution Professional with Directors and KMP of the Company were held on 12th February, 2021 for approval of the Unaudited Financial Results both standalone and consolidated basis for the quarter ended 31.12.2020 .</p> | |

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| Annexure 1 | | |
| IV. Meeting of Committees | | |
| Disclosure of notes on meeting of committees explanatory | | Textual Information(1) |
| Text Block | | |
| Textual Information(1) | <p>In consonance with the stipulation contained in Section 17, 18 and 20 of the IBC, 2016, the powers of the Board of Directors and its Committees stand suspended and the same are vested with and exercised by Resolution Professional.</p> <p>Further, as per SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the provisions specified in Regulations 17, 18, 19 and 20 are not applicable to the Company w.e.f 7th February, 2020 due to initiation of CIRP against the Company. Therefore, no committee meetings held during the quarter ended 31st March, 2021.</p> | |

| Annexure 1 | | | |
|---|--|-------------------------------|--|
| V. Related Party Transactions | | | |
| Sr | Subject | Compliance status (Yes/No/NA) | If status is "No" details of non-compliance may be given here. |
| 1 | Whether prior approval of audit committee obtained | NA | |
| 2 | Whether shareholder approval obtained for material RPT | NA | |
| 3 | Whether details of RPT entered into pursuant to omnibus approval have been reviewed by Audit Committee | NA | |
| Disclosure of notes on related party transactions | | | Textual Information(1) |

| | |
|------------------------|---|
| Text Block | |
| Textual Information(1) | <p>In consonance with the stipulation contained in Section 17, 18 and 20 of the IBC, 2016, the powers of the Board of Directors and its Committees stand suspended and the same are vested with and exercised by Resolution Professional.</p> <p>Further, as per SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the provisions specified in Regulations 17, 18, 19 and 20 are not applicable to the Company w.e.f 7th February, 2020 due to initiation of CIRP against the Company</p> |

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Annexure 1**VI. Affirmations**

| Sr | Subject | Compliance status (Yes/No) |
|----|--|----------------------------|
| 1 | The composition of Board of Directors is in terms of SEBI (Listing obligations and disclosure requirements) Regulations, 2015 | Yes |
| 2 | The composition of the following committees is in terms of SEBI(Listing obligations and disclosure requirements) Regulations, 2015 a. Audit Committee | Yes |
| 3 | The composition of the following committees is in terms of SEBI(Listing obligations and disclosure requirements) Regulations, 2015. b. Nomination & remuneration committee | Yes |
| 4 | The composition of the following committees is in terms of SEBI(Listing obligations and disclosure requirements) Regulations, 2015. c. Stakeholders relationship committee | Yes |
| 5 | The composition of the following committees is in terms of SEBI(Listing obligations and disclosure requirements) Regulations, 2015. d. Risk management committee (applicable to the top 500 listed entities) | NA |
| 6 | The committee members have been made aware of their powers, role and responsibilities as specified in SEBI (Listing obligations and disclosure requirements) Regulations, 2015. | Yes |
| 7 | The meetings of the board of directors and the above committees have been conducted in the manner as specified in SEBI (Listing obligations and disclosure requirements) Regulations, 2015. | No |
| 8 | This report and/or the report submitted in the previous quarter has been placed before Board of Directors. | No |
| 9 | Any comments/observations/advice of Board of Directors may be mentioned here: | Textual Information(1) |

Annexure 1

| Sr | Subject | Compliance status |
|----|-------------------|--|
| 1 | Name of signatory | Anil Prasad Shaw |
| 2 | Designation | Company Secretary and Compliance Officer |

Text Block

| | |
|------------------------|--|
| Textual Information(1) | <p>In consonance with the stipulation contained in Section 17, 18 and 20 of the IBC, 2016, the powers of the Board of Directors and its Committees stand suspended and the same are vested with and exercised by Resolution Professional.</p> <p>Further, as per SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the provisions specified in Regulations 17, 18, 19 and 20 are not applicable to the Company w.e.f 7th February, 2020 due to initiation of CIRP against the Company</p> <p>Mr. Ankit Rungta and Mr. Ankit Jain, Independent Directors have placed their resignations before the Company w.e.f. 7th March, 2020, Mrs. Sujata Agarwal, Independent Director has placed her resignation before the Company w.e.f. 29th May, 2020 and Mr. Sharat Malik, Independent Director has also placed his resignation before the Company w.e.f. 20th July, 2020. The same were put up before CoC by RP. However, none of the resignations were approved by CoC.</p> |
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Annexure II

| Annexure II to be submitted by listed entity at the end of the financial year (for the whole of financial year) | | | | |
|---|---|-------------------------------|--|---|
| I. Disclosure on website in terms of Listing Regulations | | | | |
| Sr | Item | Compliance status (Yes/No/NA) | If status is "No" details of non-compliance may be given here. | Web address |
| 1 | Details of business | Yes | | http://www.rohitferrotech.com/profile.html |
| 2 | Terms and conditions of appointment of independent directors | Yes | | http://www.rohitferrotech.com/draft-letter.html |
| 3 | Composition of various committees of board of directors | Yes | | http://www.rohitferrotech.com/composition-board-committees.pdf |
| 4 | Code of conduct of board of directors and senior management personnel | Yes | | http://www.rohitferrotech.com/code-of-conduct.html |
| 5 | Details of establishment of vigil mechanism/ Whistle Blower policy | Yes | | http://www.rohitferrotech.com/vigil-mechannism.pdf |
| 6 | Criteria of making payments to non-executive directors | Yes | | http://www.rohitferrotech.com/nomination-remuneration-policy.pdf |
| 7 | Policy on dealing with related party transactions | Yes | | http://www.rohitferrotech.com/Policy-on-Materiality-of-Related-party-Transactions-and-on-dealing-with-RPT.pdf |
| 8 | Policy for determining 'material' subsidiaries | Yes | | http://www.rohitferrotech.com/policy-for-determination-of-material-subsiidiary.pdf |
| 9 | Details of familiarization programmes imparted to independent directors | NA | | |

| Annexure II | | | | |
|---|--|-------------------------------|--|---|
| Annexure II to be submitted by listed entity at the end of the financial year (for the whole of financial year) | | | | |
| I. Disclosure on website in terms of Listing Regulations | | | | |
| Sr | Item | Compliance status (Yes/No/NA) | If status is "No" details of non-compliance may be given here. | Web address |
| 10 | Contact information of the designated officials of the listed entity who are responsible for assisting and handling investor grievances | Yes | | http://www.rohitferrotech.com/investor-grievance.html |
| 11 | email address for grievance redressal and other relevant details | Yes | | http://www.rohitferrotech.com/investor-grievance.html |
| 12 | Financial results | Yes | | http://www.rohitferrotech.com/financial.html |
| 13 | Shareholding pattern | Yes | | http://www.rohitferrotech.com/investors.html |
| 14 | Details of agreements entered into with the media companies and/or their associates | NA | | |
| 15 | Schedule of analyst or institutional investor meet and presentations made by the listed entity to analysts or institutional investors simultaneously with submission to stock exchange | NA | | |
| 16 | New name and the old name of the listed entity | Yes | | http://www.rohitferrotech.com/profile.html |
| | | | | http://www.rohitferrotech.com/newspaper- |

| | | | | |
|---|---|-----|--|---|
| 17 | Advertisements as per regulation 47 (1) | Yes | | publications.html |
| 18 | Credit rating or revision in credit rating obtained | NA | | |
| 19 | Separate audited financial statements of each subsidiary of the listed entity in respect of a relevant financial year | No | Non availability of Audited Accounts of subsidiary . | |
| 20 | Whether company has provided information under separate section on its website as per Regulation 46(2) | Yes | | http://www.rohitferrotech.com/disclosure-under-regulation-46-of-listing-regulations.pdf |
| 21 | Materiality Policy as per Regulation 30 | Yes | | http://www.rohitferrotech.com/policy-disclosure-material-event-information.pdf |
| 22 | Dividend Distribution policy as per Regulation 43A (as applicable) | NA | | |
| 23 | It is certified that these contents on the website of the listed entity are correct | Yes | | http://www.rohitferrotech.com/certificate-of-correctness.html |
| Disclosure of notes on website in terms of Listing Regulations explanatory [Text Block] | | | | Textual Information(1) |

| Text Block | |
|------------------------|--|
| Textual Information(1) | The National Company Law Tribunal (NCLT), Kolkata Bench, vide order dated 7th February, 2020 in Company Petition No. 1214/KB/2018 has initiated CIRP under Section 7 of the Insolvency and Bankruptcy Code, 2016. Mr Supriyo Kumar Chaudhuri (IP Registration No. IBBI/IPA-001/IP-P00644/2017-18/11098) was appointed as IRP to manage affairs of the Company in accordance with the provisions of the Code. He was later on confirmed as RP by Committee of Creditors at their 1st meeting held on 5th March, 2020. |

| Annexure II | | | | |
|-------------------------|---|------------------------|-------------------------------|--|
| II. Annual Affirmations | | | | |
| Sr | Particulars | Regulation Number | Compliance status (Yes/No/NA) | If status is "No" details of non-compliance may be given here. |
| 1 | Independent director(s) have been appointed in terms of specified criteria of 'independence' and/or 'eligibility' | 16(1)(b) & 25(6) | Yes | |
| 2 | Board composition | 17(1), 17(1A) & 17(1B) | NA | |
| 3 | Meeting of Board of directors | 17(2) | NA | |
| 4 | Quorum of Board meeting | 17(2A) | NA | |
| 5 | Review of Compliance Reports | 17(3) | NA | |
| 6 | Plans for orderly succession for appointments | 17(4) | NA | |
| 7 | Code of Conduct | 17(5) | Yes | |
| 8 | Fees/compensation | 17(6) | NA | |
| 9 | Minimum Information | 17(7) | NA | |
| 10 | Compliance Certificate | 17(8) | Yes | |

| Annexure II | | | | |
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| II. Annual Affirmations | | | | |
|--------------------------------|---|-----------------------|-------------------------------|--|
| Sr | Particulars | Regulation Number | Compliance status (Yes/No/NA) | If status is "No" details of non-compliance may be given here. |
| 11 | Risk Assessment & Management | 17(9) | NA | |
| 12 | Performance Evaluation of Independent Directors | 17(10) | NA | |
| 13 | Recommendation of Board | 17(11) | NA | |
| 14 | Maximum number of Directorships | 17A | NA | |
| 15 | Composition of Audit Committee | 18(1) | NA | |
| 16 | Meeting of Audit Committee | 18(2) | NA | |
| 17 | Composition of nomination & remuneration committee | 19(1) & (2) | NA | |
| 18 | Quorum of Nomination and Remuneration Committee meeting | 19(2A) | NA | |
| 19 | Meeting of Nomination and Remuneration Committee | 19(3A) | NA | |
| 20 | Composition of Stakeholder Relationship Committee | 20(1), 20(2) & 20(2A) | NA | |

Annexure II

| II. Annual Affirmations | | | | |
|--------------------------------|---|------------------------------|-------------------------------|--|
| Sr | Particulars | Regulation Number | Compliance status (Yes/No/NA) | If status is "No" details of non-compliance may be given here. |
| 21 | Meeting of Stakeholders Relationship Committee | 20(3A) | NA | |
| 22 | Composition and role of risk management committee | 21(1),(2),(3),(4) | NA | |
| 23 | Meeting of Risk Management Committee | 21(3A) | NA | |
| 24 | Vigil Mechanism | 22 | Yes | |
| 25 | Policy for related party Transaction | 23(1),(1A),(5),(6),(7) & (8) | Yes | |
| 26 | Prior or Omnibus approval of Audit Committee for all related party transactions | 23(2), (3) | NA | |
| 27 | Approval for material related party transactions | 23(4) | NA | |
| 28 | Disclosure of related party transactions on consolidated basis | 23(9) | Yes | |
| 29 | Composition of Board of Directors of unlisted material Subsidiary | 24(1) | NA | |
| 30 | Other Corporate Governance requirements with respect to subsidiary of listed entity | 24(2),(3),(4),(5) & (6) | NA | |

Annexure II

| II. Annual Affirmations | | | | |
|--------------------------------|-------------|-------------------|-------------------------------|--|
| Sr | Particulars | Regulation Number | Compliance status (Yes/No/NA) | If status is "No" details of non-compliance may be given here. |
| | | | | |

| | | | | |
|--------------------------------------|---|---------------|------------------------|---|
| 31 | Annual Secretarial Compliance Report | 24(A) | Yes | |
| 32 | Alternate Director to Independent Director | 25(1) | NA | |
| 33 | Maximum Tenure | 25(2) | Yes | |
| 34 | Meeting of independent directors | 25(3) & (4) | NA | |
| 35 | Familiarization of independent directors | 25(7) | NA | |
| 36 | Declaration from Independent Director | 25(8) & (9) | NA | |
| 37 | D & O Insurance for Independent Directors | 25(10) | NA | |
| 38 | Memberships in Committees | 26(1) | NA | |
| 39 | Affirmation with compliance to code of conduct from members of Board of Directors and Senior management personnel | 26(3) | No | Many of directors has not affirmed the compliances as they resigned and not attending meeting but their resignation has not been approved by Committee of Creditors. |
| 40 | Disclosure of Shareholding by Non-Executive Directors | 26(4) | Yes | |
| 41 | Policy with respect to Obligations of directors and senior management | 26(2) & 26(5) | No | Many of directors resigned and not attending meeting and are not in compliances with obligations but their resignation has not been approved by Committee of Creditors. |
| Any other information to be provided | | | Textual Information(1) | |

Text Block

| | |
|------------------------|--|
| Textual Information(1) | <p>Mr. Ankit Rungta and Mr. Ankit Jain, Independent Directors have placed their resignations before the Company w.e.f. 7th March, 2020, Mrs. Sujata Agarwal, Independent Director has placed her resignation before the Company w.e.f. 29th May, 2020 and Mr. Sharat Malik, Independent Director has also placed his resignation before the Company w.e.f. 20th July, 2020. The same were put up before CoC by RP. However, none of the resignations were approved by CoC.</p> <p>Further, as per SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the provisions specified in Regulations 17, 18, 19 and 20 are not applicable to the Company w.e.f 7th February, 2020 due to initiation of CIRP against the Company</p> |
|------------------------|--|

Annexure II

| | | |
|---|-------------------|--|
| 1 | Name of signatory | Anil Prasad Shaw |
| 2 | Designation | Company Secretary and Compliance Officer |

Annexure II

III. Affirmations

| Sr | Particulars | Compliance status (Yes/No/NA) |
|--------------------------------------|--|-------------------------------|
| 1 | The Listed Entity has approved Material Subsidiary Policy and the Corporate Governance requirements with respect to subsidiary of Listed Entity have been complied | NA |
| Any other information to be provided | | |

| Annexure II | | |
|--------------------|-------------------|--|
| 1 | Name of signatory | Anil Prasad Shaw |
| 2 | Designation | Company Secretary and Compliance Officer |

| Signatory Details | |
|--------------------------|--|
| Name of signatory | Anil Prasad Shaw |
| Designation of person | Company Secretary and Compliance Officer |
| Place | Kolkata |
| Date | 12-04-2021 |