

“श्री जी”



## National General Industries Ltd.

An ISO 9001 : 2015 Certified Company

CIN No. : L74899DL1987PLC026617

30<sup>th</sup> May, 2024

The Manager  
Department of Corporate Services  
Bombay Stock Exchange Ltd.  
25<sup>th</sup> Floor, Phiroze Jeejeebhoy Towers  
Dalal Street  
Mumbai-400001

Ref. : **Scrip Code 531651**

Sub. : **Annual Secretarial Compliance Report for the year ended on 31<sup>st</sup> March, 2024**

In compliance with Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed Annual Secretarial Compliance Report for the Financial Year ended 31st March 2024, issued by M/s. Deepak Bansal & Associates, Practicing Company Secretary.

You are requested to take the above in your record.

Thanking you.

Yours faithfully,

For **NATIONAL GENERAL INDUSTRIES LTD.**

VANDANA  
A GUPTA

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VANDANA GUPTA  
Date: 2024.05.30  
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**VANDANA GUPTA**  
**COMPANY SECRETARY**

Memb. No. : ACS 24012

Encl.: As above.



• Engineering Steel • Rounds • Squares • Flats  
Regd Off 3<sup>rd</sup> Floor, Surya Plaza, K-185/1, Sarai Julena, New Friends Colony, New Delhi 110025

Phone : + 91-11-49872442, 48 • E-mail : cs@modisteel.net

Re-Rolling Unit : 9<sup>th</sup> Mile Stone, G.T. Road, Mohan Nagar, Ghaziabad – 201007

Phone : + 91-120-4552920, +91-120-4552900

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# DEEPAK BANSAL & ASSOCIATES

## Company Secretaries

Flat No.1601, 16th Floor, Tower M, Arihant Arden, Plot No.GH-07A,  
Sector 01, Greater Noida, Gautam Buddha Nagar, Uttar Pradesh-201306  
Ph.: 98991 67774; Email: csdeepakbansal@gmail.com

### SECRETARIAL COMPLIANCE REPORT OF NATIONAL GENERAL INDUSTRIES LIMITED FOR THE YEAR ENDED 31.03.2024

We, Deepak Bansal & Associates, Practicing Company Secretaries, Noida have examined:

- all the documents and records made available to us and explanation provided by **National General Industries Limited CIN: L74899DL1987PLC026617** (“the listed entity”),
- the filings/ submissions made by the listed entity to the stock exchange,
- website of the listed entity,
- any other document/ filing, as may be relevant, which has been relied upon to make this report,

for the year ended **31.03.2024** (“Review Period”) in respect of compliance with the provisions of:

- the Securities and Exchange Board of India Act, 1992 (“SEBI Act”) and the Regulations, circulars, guidelines issued thereunder; and
- 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: -

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **(Not applicable to the company during the Audit Period)**
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **(Not applicable to the company during the Audit Period)**
- Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **(Not applicable to the company during the Audit Period)**
- Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **(Not applicable to the company during the Audit Period)**
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

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- h. Securities and Exchange Board of India (Depositories and Participants) Regulations, 1996;
- i. Securities and Exchange Board of India (Registrars to an issue and Share Transfer Agents) Regulations 1993;

and circulars/ guidelines issued thereunder;

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

I. (a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters specified below

Sr. No.	Compliance Requirement (Regulations/ circulars/ guide- lines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
1	Regulation 17(1C) of SEBI LODR, 2015	Regulation 17(1C) of SEBI LODR, 2015	Delay in taking Approval of shareholders for Independent Director appointed on 14 <sup>th</sup> February, 2023.	No action	No action	Delay in taking Approval of shareholders for Independent Director appointed on 14 <sup>th</sup> February, 2023.	Nil	The Company has taken approval of shareholders at the Annual General Meeting of the Company held on 30 <sup>th</sup> September, 2023.	The Company has rectified the default by taking approval of shareholders at the Annual General Meeting of the Company held on 30 <sup>th</sup> September, 2023.	This is not a material non-compliance.

(b) The listed entity has taken the following actions to comply with the observations made in previous reports: -----**NA**-----

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Sr. No.	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
						NA				

I. We hereby report that, during the review period the compliance status of the listed entity is appended as below:

Sr. No.	Particulars	Compliance Status (Yes / No/NA)	Observations / Remarks by PCS*
1.	<b>Secretarial Standards:</b>  The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.	Yes	
2.	<b>Adoption and timely updation of the Policies:</b> <ul style="list-style-type: none"><li>All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities</li><li>All the policies are in conformity with SEBI Regulations and have been reviewed &amp; updated on time, as per the regulations/circulars/guidelines issued by SEBI</li></ul>	Yes  Yes	

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3.	<b>Maintenance and disclosures on Website:</b> <ul style="list-style-type: none"><li>● The Listed entity is maintaining a functional website</li><li>● Timely dissemination of the documents/ information under a separate section on the website</li><li>● Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re-directs to the relevant document(s)/ section of the website</li></ul>	Yes  Yes  Yes	
4.	<b>Disqualification of Director:</b> <p>None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.</p>	Yes	
5.	<b>Details related to Subsidiaries of listed entities have been examined w.r.t.:</b> <p>(a) Identification of material subsidiary companies.</p> <p>(b) Disclosure requirement of material as well as other subsidiaries</p>	Not Applicable  Not Applicable	There is no material Subsidiary  There is no subsidiary
6.	<b>Preservation of Documents:</b> <p>The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.</p>	Yes	

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7.	<b>Performance Evaluation:</b>  The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.	Yes	
8.	<b>Related Party Transactions:</b>  a. The listed entity has obtained prior approval of Audit Committee for all related party transactions; or  b. The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ ratified/ rejected by the Audit Committee, in case no prior approval has been obtained.	Yes  Not Applicable	  There was no such eventuality
9.	<b>Disclosure of events or information:</b>  The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.	Yes	
10.	<b>Prohibition of Insider Trading:</b>  The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	
11.	<b>Actions taken by SEBI or Stock Exchange(s), if any:</b>  No action(s) has been taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder(or)	Yes	

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	The actions taken against the listed entity/ its promoters / directors/ subsidiaries either by SEBI or by Stock Exchanges are specified in the last column.	Not Applicable	No action taken
12.	<b>Resignation of Statutory Auditors from the Listed entity or its material subsidiaries</b> In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and /or its material subsidiary(ies) has/have complied with paragraph 6.1 and 6.2 of section V-D of chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities.	No	There was no eventuality of resignation by the statutory auditors.
13.	<b>Additional Non-compliances, if any:</b> No additional non-compliance observed for any SEBI regulation/circular/guidance note etc. except as reported above.	Not Applicable	No additional non-compliance

### Assumptions & Limitation of scope and Review:

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to certify based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial Records and Books of Accounts of the listed entity.

DEEPAK Digitally signed by  
DEEPAK BANSAL  
BANSAL Date: 2024.05.30  
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4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

For **Deepak Bansal & Associates**

Company Secretaries

(Firm No. S2007UP59100)

P R No.900/2020

DEEPAK  
BANSAL

Digitally signed by  
DEEPAK BANSAL  
Date: 2024.05.30  
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**(Deepak Bansal)**

Proprietor

FCS No.: 3736

C P No.: 7433

UDIN: F003736F000492400

Date: 30.05.2024

Place: Greater Noida