

A. R. JOSHI & ASSOCIATES

Practicing Company Secretary

Office: - Bharat Bazar Commercial Complex, "E" wing, 'A' Office, API Corner, M.I.D.C
Chikalthana, Aurangabad. Ph.- 2480415, 9325228194

SECRETARIAL COMPLIANCE REPORT OF LAXMI COTSPIN LIMITED FOR THE YEAR ENDED 31ST MARCH 2021.

I, Arun Rajabhau Joshi, A. R. Joshi & Associates, Practicing Company Secretary, Aurangabad, have examined:

- (a) all the documents and records are made available to us and explanation provided by the management of Laxmi Cotspin Limited,
- (b) the filings/ submissions are made by the listed entity to the stockexchanges, from time to time.
- (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 2021 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 year under review.**
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; **Not applicable during the year under review.**



- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations,2018; **Not applicable during the year under review.**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations,2014;**Not applicable during the year under review**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations,2008;**Not applicable during the year under review**
- (g) Securities and Exchange Board of India(Issue and Listing of Non-Convertible and Redeemable Preference Shares)Regulations,2013;**Not applicable during the year under review**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations,2015;

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 matters specified below:-

| Sr.No | Compliance Requirement (Regulations/ circulars / guidelines including specific clause) | Deviations | Observations / Remarks of the Practicing Company Secretary |
|-------|--|------------|--|
| 1. | No Deviation Found | N.A. | N.A. |
| | | | |

- (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) 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 issuedthereunder:

| 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. |
|---------|-----------------|----------------------|---|---|
| | NIL | NIL | NIL | NIL |
| | | | | |



(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 2020 (The years are to be mentioned) | Actions taken by the listed entity, if any | Comments of the Practicing Company Secretary on the actions taken by the listed entity |
|---------|--|---|---|--|
| 1. | Minutes of meetings are still not as per Secretarial Standards issued by ICSI. | NIL | Minutes are signed by the Chairman of the meetings. | Further, much improvement is required to match with Secretarial Standards. |



For A. R. Joshi & Associates,

AR Joshi

A. R. Joshi

ACS-5480

CP No.: 4247

Place: Aurangabad

Date: 01/09/2021

UDIN: A005480C000874612