

JUNE 11, 2021

The Manager
BSE Limited
P J Towers, Dalal Street,
Fort, Mumbai 400001

COMPANY CODE NO. 530643

ISIN: INE316A01038

Dear Sir/Madam,

**Subject: Compliance under Regulation 24(A) of the Securities and Exchange Board of India
(Listing Obligations and Disclosure Requirements) Regulations, 2015**

Pursuant to Regulation 24(A) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirement), Regulations 2015 read with circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019, we enclose herewith the Annual Secretarial Compliance Report issued by Jyoti Dubey & Associates practicing Company Secretary for the financial year ended March 31, 2021.

This is for your information and records.

For Eco Recycling Limited



B. K. Soni
Chairman and Managing Director
DIN: 01274250



JYOTI DUBEY & ASSOCIATES

Company Secretaries in Practice

6, NEEL NANDINI 'B', 69 LINKING ROAD, KHAR (W), MUMBAI – 400 052.

Email: uptodatecompliances@gmail.com/ Mobile no.: +91 97733 07333



SECRETARIAL COMPLIANCE REPORT OF ECO RECYCLING LIMITED FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2021.

The Board of Directors

Eco Recycling Limited

422, 4th Floor,
The Summit Business Bay,
Near Cine Max Theater,
Andheri Kurla Road,
Andheri (E), Mumbai – 400 093.

We have examined:

(a) all the documents and records made available to us and explanation provided by **Eco Recycling Limited (CIN: L74120MH1994PLC079971)** ("listed entity").

(b) the filings/ submissions made by the listed entity to the stock exchanges,

(c) website of the listed entity,

(d) all other document/filing, as may be relevant, which has been relied upon to make this certification, for the financial year ended 31st March, 2021 ("Review Period") in respect of compliance with the provisions of:

(i) the Securities and Exchange Board of India Act, 1992("SEBI Act") and the Regulations, circulars, guidelines issued there under; and

(ii) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made there under 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;

(c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011: **Not applicable**

(d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018: **Not applicable**

(e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014

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(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008

(g) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013

(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; and the circulars and guidelines issued thereunder;

(i) Securities and Exchange Board of India (Depositories & Participants) Regulations, 2018;

(j) Other regulations as applicable to the Company and circulars/guidelines issued thereunder;

And based on the above examination, We 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,

(b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/guidelines issued thereunder in so far as it appears from 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.	Actions taken by	Details of violation	Details of action taken eg. Fines, warning letter, debarment etc	Observations/ Remarks of the Practising Company Secretary, if any
1.	BSE	Regulation 33: Non-submission of the financial results within the period prescribed under this regulation for the period September 30, 2020	Fine levied of Rs. 1,59,300	According to our examination & explanation provided by the Company to us the delay was due CoVID-19 pandemic a global phenomenon.
2.	BSE	Regulation 34: Non-submission of the Annual Report within the period prescribed under this regulation for the period March 31, 2020	Fine levied of Rs. 7,080	According to our examination & explanation provided by the Company to us the delay was due CoVID-19 pandemic a global phenomenon.

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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 Practising Company Secretary in the previous report	Observations made in the Secretarial compliance report for the financial year ended 31 st March 2021	Actions taken by listed entity, if any	Comments of the practicing Company Secretary on the actions taken by the listed entity
NA				

Considering the situation due to pandemic "COVID 2019" and lockdown being declared in the State of Maharashtra, the process of audit has been modified. Books, documents, records, e-forms (forms) and returns, registers, minutes were not verified physically and the same were made available in electronic mode and were verified on the basis of the representations received and made by the management of the Company, its officers, agents and authorised representatives for its accuracy and authenticity. Accordingly, wherever, in the report, words such as "examined" "review" "verification" being stated it should be construed as examination, review, verification of electronic records.

For Jyoti Dubey & Associates

JYOTI
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AL DUBEY

Digitally signed by JYOTI MADANLAL DUBEY
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87839b5f5110304f6620b5933bdc
postalCode=400089, st=MAHARASHTRA,
serialNumber=D0A2B1C5230B069AC32055B7
(8B77208cd4a4dc9ca33e2917b17a8b65146,
cn=JYOTI MADANLAL DUBEY, E=ALDUBEA@
gmail.com, o=Jyoti Dubey & Associates, ou=Jyoti Dubey & Associates,
c=IN, email=DUBEYJYOTI@GMAIL.COM,
Date: 2021.06.10 17:41:39 +05'30'

Jyoti Dubey
Practising Company Secretary
Membership No. A64673 (ACS)
C.P. No: 24221
UDIN: A064673C000444382

Date: 10 June, 2021

Place: Mumbai

This Report is to be read with our letter of even date annexed herewith and forms an integral part of this Report.

JYOTI DUBEY & ASSOCIATES

Company Secretaries in Practice

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ANNEXURE

To

Eco Recycling Limited

The Secretarial Compliance Report of even date is to be read along with this letter.

- 1) Maintenance of secretarial records under regulations, circulars and guidelines prescribed under the Securities and Exchange Board of India Act, 1992 (SEBI ACT) and the Securities Contracts (Regulation) Act, 1956 (SCRA) rules made thereunder and Regulations, circulars and guidelines issued thereunder by SEBI, is the responsibility of the management of the Company. Our responsibility is to express an opinion on these records based on our audit.
- 2) We have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of these records. The verification was done to ensure that correct facts are reflected in the said records. We believe that the processes and practices we followed provide a reasonable basis for our opinion.
- 3) We have not verified the correctness and appropriateness of financial records and Books of Account of the Company.
- 4) Where ever required, we have obtained the Management representation about the compliance of laws, rules and regulations and happening of events etc.
- 5) The compliance of the provisions of SEBI ACT and SCRA, and regulations, circulars and guidelines prescribed thereunder, is the responsibility of management. Our examination was limited to the verification of documents and records made available to us and explanations provided to us with respect to the practices and processes followed in matters relating to this Report.
- 6) The Secretarial Compliance Report is neither an assurance as to the future viability of the Company nor of the efficacy or effectiveness with which the management has conducted the affairs of the Company.

For **Jyoti Dubey & Associates**

JYOTI
MADANL
AL DUBEY

Digitally signed by JYOTI MADANLAL DUBEY
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c=IN, email=jyoti.dubey@jyotidubey.com,
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Jyoti Dubey
Practising Company Secretary
Membership No. A64673 (ACS)
C.P. No: 24221

UDIN: A064673C000444382

Date: 10 June, 2021

Place: Mumbai