

**SECRETARIAL COMPLIANCE REPORT**

(Pursuant to Regulation 24A of the SEBI (LODR) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8<sup>th</sup> February, 2019)

**OF  
FLUIDOMAT LIMITED  
for the year ended 31.03.2021**

I, **CS (Dr.) Dilip Kumar Jain**, proprietor of M/s D.K. Jain & Co., Company Secretaries have examined:

- all the documents and records made available to us and explanation provided by **Fluidomat Limited**. (CIN: L74210MP1978PLC001452) ("the Listed Entity")
- the filings/ submissions made by the listed entity to the BSE Ltd., - [www.bseindia.com](http://www.bseindia.com)
- website of the company, - [www.fluidomat.com](http://www.fluidomat.com).
- any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended **31<sup>st</sup> March, 2021** ("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: -

- SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- SEBI (Buyback of Securities) Regulations 2018;
- SEBI (Share Based Employee Benefits) Regulations, 2014;
- SEBI (Issue and Listing of Debt Securities) Regulations, 2008;
- SEBI (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- SEBI (Prohibition of Insider Trading) Regulations, 2015;
- circulars/guidelines issued thereunder;

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

- The listed entity has complied with the provisions of the above Regulations and circulars/guidelines issued thereunder as applicable to it (however, the Regulations mentioned above under (d) to (g) are not applicable to the company as there were no such activities as covered under the said regulations) during the review period, 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.	As per Regulation 7(2) of SEBI (PIT) Regulations, 2015, the promoter or	The Member of Promoter Group has not reported to the company	Mr. Surendra Shantilal Kothari (Member of Promoter Group) pledged



member of promoter group or designated person shall disclose to the company the securities acquired or disposed off within two trading days of such transaction taken place.	within two trading days of such transaction specified under this regulation.	his 17,200 Equity shares on 25 <sup>th</sup> Sept., 2020 but failed to report to the company about such event within two trading days in terms of Circular No. SEBI/HO/MIRSD/DOP/CIR/P/2 dtd. 25 <sup>th</sup> Feb., 2020. However, the said promoter has reported to the company on 19 <sup>th</sup> Oct., 2020 and the company has reported to the Stock exchange on 19 <sup>th</sup> October 2020 on the same day.
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(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 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.
=====None=====				

(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	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
=====N.A.=====				

Place: Indore  
Date: 16<sup>th</sup> June, 2021  
UDIN: F003565C000472957



For, D. K. JAIN & CO.,  
COMPANY SECRETARIES  
FRN No. 11995MP067500

CS (Dr.) D.K. JAIN  
PROPRIETOR  
FCS No.: 3565  
C P No.: 2382  
Peer review: 743/2020