



28th June, 2021

Ref. No.: 101424/S/O/L-1/2021-22

The Manager,
Listing/Market Operation,
National Stock Exchange of India Ltd.,
Exchange Plaza,
Bandra – Kurla Complex,
Bandra (E),
Mumbai – 400 051

The Manager,
Corporate Relationship Department,
BSE Limited,
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai – 400 001

NSE Code – ASAHIINDIA

BSE Code – 515030

Sub: Annual Secretarial Compliance Report for the year ended 31st March, 2021

Dear Sir/ Madam,

Pursuant to SEBI Circular no. CIR/CFD/CMD1/27/2019 dated 8th February, 2019 read with SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended, we hereby enclose the Annual Secretarial Compliance Report for the year ended 31st March, 2021.

You are requested to kindly take the same on record.

Thanking you,

Yours truly,
For Asahi India Glass Ltd.,

Gopal Ganatra
Executive Director
General Counsel & Company Secretary
Membership No.: F7090

Encl.: As above

Asahi India Glass Ltd.

Corporate Office: 5th, 6th & 8th Floor,
Tower-B, Global Business Park
Mehrauli -Gurgaon Road
Gurgaon- 122002 (India)
Tel.: +91 124 4062212-19
Fax: +91 124 4062244, 4062288
Corporate Identity Number: L26102DL1984PLC019542
website : www.aisglass.com

Registered Office: Unit No.203 to 208, Tribhuvan Complex,
Ishwar Nagar, Mathura Road, New Delhi- 110065

SECRETARIAL COMPLIANCE REPORT

Asahi India Glass Limited.

for the year ended on March 31, 2021

We have examined:

- a) All the documents and records made available to us and explanation provided by Asahi India Glass Limited ("the listed entity"),
- b) The filings/ submissions made by the listed entity to the stock exchanges.
- c) Website of the listed entity,
- d) Other relevant documents and filing

for the year ended on March 31, 2021 ("Review Period") 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;
- c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011,
- d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018.
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2018;
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2018;



- 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
- i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 and circulars/ guidelines issued thereunder;

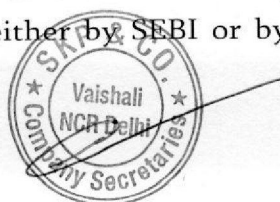
And based on the above examination, we hereby report that, during the Review Period:

- a) The Listed Entity has Complied with the provisions of the above Regulations and circulars /guidelines issued thereunder, 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.	<p>Proviso to Regulation 17(1)(b)) of SEBI (Listing Obligations and Disclosure Requirement) Regulation 2015. It provides as under :</p> <p>'Where the Regular Non executive Chairperson is a promoter of the Listed entity or is related to any promoter or person occupying management positions at the level of Board of Director or at one level below the Board of Directors, at least half of the Board of Directors of the listed entity shall consist of Independent Directors.'</p>	<p><i>The Board of Director of the Listed Entity was found to be short of one Independent Director in its constitution till September 10, 2020.</i></p>	<p><i>The Company defaulted in complying with the proviso to Regulation 17(1)(b)) of SEBI (Listing Obligations and Disclosure Requirement) Regulation 2015.</i></p>

- 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 Record

- 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 E.g. fines, warning letter, debarment etc..	Observations/ Remarks of the Practicing Company Secretary
1	National Stock Exchange of India Limited (NSE)	Non-compliance with Regulation 17(1) of SEBI (Listing Obligation & Disclosure Requirements) Regulations, 2015.	NSE has imposed a total fine (inclusive of GST) of RS. 5,36,900 /-(Five lakh thirty six thousand and nine hundred) and Rs. 4,24,800 (Four lakh twenty four thousand and eight hundred) for the quarter ended on June 30, 2020 and September 30, 2020 vide notice ref no. NSE/ LIST-SOP/ CG/FINES/101661 dated August 20, 2020 and NSE/ LIST-SOP/ COMB/FINES/0810 dated November 17, 2020 respectively.	The Company has duly paid the fine imposed by NSE vide its Notice dated August 20, 2020 and November 17, 2020.
2.	Bombay Stock Exchange of India Limited. (BSE)	Non-compliance with Regulation 17(1) of SEBI (Listing Obligation & Disclosure Requirements) Regulations, 2015.	BSE has imposed a total fine (inclusive of GST) of RS. 5,36,900 /-(Five lakh thirty six thousand and nine hundred) and Rs. 4,24,800 (Four lakh twenty four thousand and eight hundred) for the quarter ended on June 30, 2020 and September 30, 2020 vide email dated August 20, 2020 and November 17, 2020 respectively.	The Company has duly paid the fine imposed by BSE vide email dated August 20, 2020 and November 17, 2020.



d) The Listed entity has taken the following actions to comply with the observation 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 on March , 2020	Actions taken by Listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the Listed entity
1.	N.A	The Board of Director of the Listed Entity was found to be short of one Independent Director in its Constitution since May 23, 2019. Thus, The Company defaulted in complying with the proviso to Regulation 17(1)(b)) of SEBI (Listing Obligation and Disclosure Requirement) Regulation 2015.	The Company has appointed Mr. Tilak Raj as Independent Director w.e.f September 11, 2020 to rectify the Non-Compliance of Regulation 17(1)(b)) of SEBI (Listing Obligations and Disclosure Requirement) Regulation 2015.	The Company has duly appointed an Independent director as required under the said regulation and hence the action taken by the Company is found to be satisfactory.

For **SKP & Co.**
Company Secretaries


(CS Sundeep K. Parashar)
M. No. : F 6136
C.P. No. : 6575
PR : 1323/2021
UDIN : F006136C000518131



Place: Vaishali
Date: 25.06.2021