GARIMA GUPTA B.Com, ACS

Practicing Company Secretary

"Shri Vinayak" 5D, Heysham Road. Opp. Julien Day School, Kolkata- 700020

Mobile: 9830478584

E-mail: garimagupta.acs@gmail.com

SECRETARIAL COMPLIANCE REPORT OF M/S. EASTERN SILK INDUSTRIES LIMITED (CIN. L17226WB1946PLC013554), HAVING ITS REGISTERED OFFICE AT 19, R.N. MUKHERJEE ROAD KOLKATA 700 001 FOR THE YEAR ENDED 31.03.2020

I, Garima Gupta have examined:

- (a) all the documents and records made available to us and explanation provided by M/s Eastern Silk Industries Limited ("the listed entity"),
- (b) the filings/submissions made by the listed entity to the stock exchanges,
- (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 31.03.2020 ("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 (Regulations) 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 (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (c) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (d) Securities and Exchange Board of India (Registrar to an issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act, 2013 and dealing with the client;
- (e) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- (f) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations 2018; (Not applicable to the Company during the review period)
- (g) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; (Not applicable to the Company during the review period)
- (h) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (Not applicable to the Company during the review period)
- (i) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (Not applicable to the Company during the review period)
- (j) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; (Not applicable to the Company during the review period)

UDIN: A023738B000399511

Place: Kolkata Date: 30.06.2020 (Continued to Page 2)

C.P. No. -93 Garima Gupta

ACS No. 23738, C P No: 9308

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And circulars/guidelines issued thereunder;

(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:-

| Sl. No. | Compliance Requirements (Regulations/Circulars/ Guidelines including specific clause) | Deviations | Observations/Remarks of the Practicing Company Secretary |
|---------|---|------------|--|
| | | NIL | |

- (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 issued thereunder:

| Sl. No. | Action taken by | Details violation | of | Details of action taken E.g. fines, warning letter, debarment, etc | |
|---------|-----------------|----------------------|----|---|--|
| | | NIL | | | |

(d) The listed entity has taken the following actions to comply with the observations made in previous reports: Not applicable.

| Sl. No. | Observations of the | Observations made | Actions taken by | Comments of |
|---------|---------------------|--------------------|--------------------|----------------|
| | Practicing | in the Secretarial | the Listed Entity, | the Practicing |
| | Company Secretary | Compliance Report | if any | Company |
| | in the Previous | for the year | - | Secretary on |
| | reports | ended(The years | | the actions |
| | | are to be | | taken by the |
| | | mentioned) | | listed entity |
| | | NIL | y 31/2 | · - × |

UDIN: A023738B000399511

Place: Kolkata Date: 30.06.2020 Garima Gupta

ACS No. 23738, C P No: 9308