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**Annual Secretarial Compliance Report of Ester Industries Limited**  
**for the Financial year ended 31st March 2021**

(In Compliance with Regulation 24A of the Securities and Exchange Board of India  
(Listing Obligations and Disclosure Requirements) Regulations 2015)

To,

**Ester Industries Limited**

Regd. Office: Sohan Nagar,  
P.O: Charubeta, Khatima,  
Distt.: Udham Singh Nagar,  
Uttarakhand- 262308

We have examined (Due to Covid-19 pandemic impact, the required documents were obtained in electronic mode and accordingly verification was done):

- (a) all the documents and records made available to us and explanation provided by M/s Ester 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 31st March 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 (Due to Covid-19 pandemic impact, the required documents were obtained in electronic mode and accordingly verification was done) 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 to the company during the Audit period).**
- (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; **(Not applicable to the company during the Audit period).**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not applicable to the company during the Audit period).**
- (g) 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 Audit period).**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

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
Not Applicable			

- (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) There are no 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.

- (d) During the Previous financial Year 2019-20, there was no observation in the report. Therefore no comment is required on action taken report on the observations.

For Dhananjay Shukla & Associates  
Company Secretaries

  
Dhananjay Shukla  
Proprietor

FCS-5886, CP No. 8271  
UDIN:F005886C000545953

Date: 30<sup>th</sup> June 2021  
Place: Gurugram