



DYNEMIC
COLOURING LIVES

30th May, 2022

To,
BSE Limited
PJ Towers, Dalal Street,
Mumbai 400 001

National Stock Exchange of India Limited
Exchange Plaza, Plot No. C/1, G Block
Bandra-Kurla Complex, Bandra (East)
Mumbai - 400 051

Scrip code : 532707

Trading Symbol : DYNPRO

Dear Sir,

Sub : Annual Secretarial Compliance Report pursuant to SEBI Circular No. CIR/CFD/CMD1/27/2019 Dated February 8, 2019

Pursuant to SEBI Circular No. CIR/CFD/CMD1/27/2019 Dated February 8, 2019, please find enclosed the Annual Secretarial Compliance Report for the year ended March 31, 2022, issued by Mr. Ashok P. Pathak & Co., Practicing Company Secretaries.

Please take the same on record.

Thanking you,

Yours faithfully,

For Dynemic Products Limited

Varsha Mehta
Company Secretary

Encl : As above

DYNEMIC PRODUCTS LTD.

Regd. Office: B-301, Satyamev Complex-1, Opp. Gujarat High Court, S.G. Road, Sola, Ahmedabad - 380 060, Gujarat, INDIA. Tel : +91 79 27663071/76
Email : info@dynemic.com Website : www.dynemic.com

Unit-I: 6401,6402,6415,6416,6400,6400/1, GIDC Estate, Ankleshwar - 393002.
Unit-II : 3709/6,3710/1,3710/3, GIDC Estate, Ankleshwar - 393002.
CIN: L24100GJ1990PLC013886

AN ISO 22000, ISO 9001 & ISO 14001 CERTIFIED COMPANY



ASHOK P. PATHAK & Co.

Company Secretaries
(Peer Reviewed Firm)

CS Ashok P. Pathak
Company Secretary &
Insolvency Professional

F- 904, Titanium City Centre, 100 ft. Anand Nagar Road,
Near Indian Oil Petrol Pump, Satellite, Ahmedabad - 380015
(O) 079-26934123 Mobile : 09327002122
E-mail : csashokppathak@gmail.com
Website : www.csashokppathak.com

SECRETARIAL COMPLIANCE REPORT (For the year ended on 31st March, 2022)

[Under Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dtd. 08/02/2019]

DYNEMIC PRODUCTS LIMITED

CIN : L24100GJ1990PLC013886
ISIN: INE256H01015

BSE : Script Code 532707
NSE : Symbol : Dynpro, Series : EQ

I CS Ashok P. Pathak, Proprietor of M/s. Ashok P. Pathak & Co., Company Secretaries have examined:

- (a) all the documents and records made available to us and explanation provided by **Dynemic Products 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 on 31st March, 2022 ("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 there under; and
- (b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), Rules made there under and the Regulations, Circulars, Guidelines issued there under by the Securities and Exchange Board of India ("SEBI");

The specific Regulations, whose provisions and the circulars/ guidelines issued there under, 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;
Not Applicable as there was no reportable event during the financial year under review.





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- (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 as there was no reportable event during the financial year under review.
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
Not Applicable as there was no reportable event during the financial year under review.
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
Not Applicable as there was no reportable event during the financial year under review.
- (g) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013;
Not Applicable as there was no reportable event during the financial year under review.
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
and Circulars/ Guidelines issued there under;

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

- (a) The listed entity has complied with the provisions of the above Regulations and Circulars/ Guidelines issued there under, except in respect of matter(s) specified below:

Sr. No.	Compliance Requirement (Regulations / circulars/ guidelines including specific clause)	Deviations	Observation/ Remarks of Practicing Company Secretary





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1.	<p>Regulation 9 r/w Clause 4 of Schedule B and Regulation 4 of SEBI (Prohibition of Insider Trading) Regulations, 2015 and SEBI Circular No. SEBI/HO/ ISD/ CIR/ P/2020/135 Dated 23/07/20</p> <p>Designated persons and their immediate relatives shall not trade in securities when the trading window is closed. Trading restriction period shall be made applicable from the end of every quarter till 48 hours after the declaration of financial results.</p>	<p>There were four instances of violation of Code of Conduct for Prohibition of Insider Trading during the closure of window period as under :</p> <p>a) Mrs. Rajulaben J Patel, one of the designated person/ Promoter has bought 500 shares at Rs.2,25,275/- during the period 16/04/2021 to 23/04/2021.</p> <p>b) Mr. Jayantilal K Patel, one of the designated person / Promoter has bought 500 shares at Rs.2,25,125/- during the period 16/04/2021 to 23/04/2021</p> <p>c) Mr. Hareesh K Patel, one of the designated person / Employee has sale 460 shares at Rs.3,22,506/- during the period 01/10/2021 to 08/10/2021</p> <p>d) Mr. Shankarlal B Mundra, one of the designated person / Independent Director has bought 100 shares at Rs.74,961/- during the period 01/10/2021 to 08/10/2021</p>	<p>The Compliance Officer issued show cause notice to aforesaid designated persons for violation of Code of Conduct for prohibition of insider trading.</p> <p>The concern designated persons have replied to show caused notice.</p> <p>The Compliance Officer has issued warning letters for such violation and waived the penalty on the grounds namely – the violation is first time, it is unintentional and the said persons were not in possession of UPSI.</p> <p>The Company has informed/ reported to the stock exchanges, in the standardize format, the aforesaid instances of violations of the Code of Conduct in accordance with Clause 13 of Schedule B of the PIT Regulations, 2015.</p> <p>The said designated persons has traded during closure of window in violation of Code of Conduct in accordance with Clause 4(2) of Schedule B r/w. Regulation 9 of PIT Regulations, 2015, and It was informed to us by the Company that it has waived the penalty under Point 12(b) of the Code of Conduct of the Company and reported such violation under clause 13 of Schedule B.</p>
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(b) The listed entity has maintained proper records under the provisions of the above Regulations and Circulars/ Guidelines issued there under in so far 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 there under.

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 the 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... (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1				NOT APPLICABLE

For, Ashok P. Pathak & Co.,
Company Secretaries,
ICSI Unique Code : S1997GJ020700

CS Ashok P. Pathak
Proprietor
ACS No : 9939 | COP No : 2662
Peer Review Certificate No. : 1519/2021
ICSI UDIN : A009939D000420272



28th May, 2022
Ahmedabad

* Insolvency Professional (IP) registered with Insolvency and Bankruptcy Board of India (IBBI) (IP Registration No. IBBI/PA-002/IP-N00329/2017- 18/10934).