



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 (M) +91 93270 02122
E-mail : csashokppathak@gmail.com

SECRETARIAL COMPLIANCE REPORT
(For the year ended on 31st March, 2020)

[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:

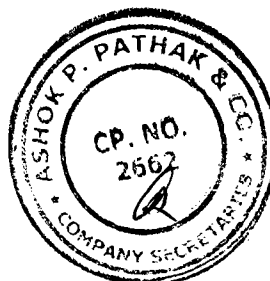
- (a) all the documents and records made available to us and explanation provided by **Dynemic Products Limited** ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended on 31st March, 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 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 review period.



Contd....2



ASHOK P. PATHAK & Co.

Company Secretaries

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 (M) +91 93270 02122
E-mail : csashokppathak@gmail.com

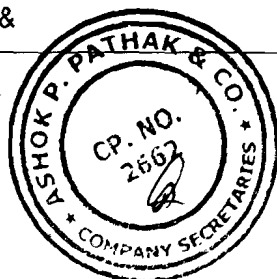
// 2 //

- (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 review period.
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
Not Applicable as there was no reportable event during the review period.
- (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 review period.
- (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 review period.
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

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 including SEBI circular CIR/ CFD/ CMD1/ 114/ 2019 dated 18th October 2019 on changes in terms of appointment of Statutory Auditors, the Company has amended the terms of appointment of the Statutory Auditor to give effect to the said Circular, 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 |
|---------|--|--|---|
| 1 | SEBI Circular No. SEBI/HO/CFD/CMD1/ CIR/P /2019/36 Dated 12/03/19 & | The company has timely submitted its Shareholding Pattern with the Stock Exchanges | With regards to non-compliance in the matter it was explained by the company that the Company has filed e-Form BEN-2 on 03/08/2019 identifying Two SBO namely |





CS Ashok P. Pathak
Company Secretary &
Insolvency Professional

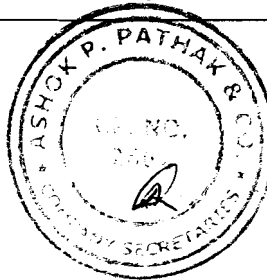
F-904, Titanium City Centre, 100 Ft Anand Nagar Road,
Near Indian Oil Petrol Pump, Satellite, Ahmedabad - 380015
(O) 079-26934123 (M) +91 93270 02122
E-mail : csashokppathak@gmail.com

// 3 //

| | | | |
|--|---|---|---|
| | SEBI Circular No. SEBI/HO/CFD/CMD1/ CIR/P/ 2018/149 Dated 07/12/18 | under Regulation 31 but have not disclosed the details of SBO in the prescribed format. | Mr. B K Patel (through his HUF) and Mr. D P Patel (through his HUF), However, due to inadvertence and uncertainty prevail the Company has not provided the SBO details in Shareholding Patterns for the quarter September, 2019, December, 2019 and March, 2020 submitted under Regulation 31 of SEBI (LODR) Regulations, 2015. The Company assure to take corrective action and to submit the details from June, 2020 quarters and onwards. |
|--|---|---|---|

- (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 |
|---------|-----------------|----------------------|---|---|
| | NOT APPLICABLE | | | |



Contd....4



**F-904, Titanium City Centre, 100 Ft Anand Nagar Road,
Near Indian Oil Petrol Pump, Satellite, Ahmedabad - 380015
(O) 079-26934123 (M) +91 93270 02122
E-mail : csashokppathak@gmail.com**

// 4 //

(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 |
|------------|---|---|--|--|
| | NOT APPLICABLE | | | |

For, Ashok P. Pathak & Co.
Company Secretaries
UCN : S1997GJ020700



CS Ashok P. Pathak*
Proprietor
ACS No. : 9939
C P No.: 2662

NOTE : Consequent to the COVID-19 pandemic throughout the world, the nationwide lockdown is being declared by the National Disaster Management Authority (NDMA) under the Disaster Management Act, 2005 (DMA) from 25th March, 2020 to contain the spread of virus. Due to COVID19 pandemic impact, certain compliance related documents were obtained through electronic mode and verified accordingly with the requirements.

Unique Document Identification Number (UDIN) allotted by the Institute of Company Secretaries (ICS) for this Secretarial Compliance Report is A009939B000390979

* Associate Member (ACS No. 9939) of the Institute of Company Secretaries of India, ICSI House, 22 Institutional Area, Lodhi Road, New Delhi-110003. website : www.icsi.edu
* Insolvency Professional (IP) registered with Insolvency and Bankruptcy Board of India (IBBI) (IP Registration No. IBBI/IPA-002/IP-N00329/2017- 18/10934).