

B – 403, 'The First', Beside ITC Narmada Hotel, Behind Keshavbaug, Vastrapur, Ahmedabad – 380 015

Tel. No. : 079-2970 2975 / 76 / 77 • Mobile: 98250 15581 • Email : kashyapmehta@hotmail.com • Web : www.cskashyap.in

To,
The Board of Directors,
ICE MAKE REFRIGERATION LIMITED
B-1, Vasupujya Chamber,
Near Navdeep Building,
Income-Tax Cross Road,
Ahmedabad – 380 009.

Dear Sirs,

Sub.: Secretarial Compliance Report for the year ended on 31st March, 2022

We, Kashyap R. Mehta & Associates, Company Secretaries, Ahmedabad have examined:

- (a) all the documents and records made available to us and explanation provided by **Ice Make Refrigeration Limited** (“the listed entity/the Company”),
- (b) the filings/ submissions made by the listed entity to The National Stock Exchange of India Limited
- (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 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;
- (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 during the reporting year-----



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(e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;

(f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; -----Not applicable during the reporting year-----

(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 there under;

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 there under, 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 there under insofar as it appears from our 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 -----				

The listed entity has taken the following actions to comply with the observations made in previous reports:



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Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended...	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	<p><u>Delay of 27 days in submission of Unaudited financial results for the quarter ended on 30thSeptember, 2020</u></p> <p>It has been represented by the Company that as per NSE Circular No. 0909/2020 dated 8thOctober, 2020, the Company is admitted to dealings on the National Stock Exchange (Capital Market Segment – Main Board) with effect from October 12, 2020. Hence, the Company was required to adopt Ind AS, 2015 w.e.f. 1st July, 2020 as per SEBI Circular No. CIR/CFD/FAC/62/2016 dated 5th July, 2016.</p> <p>As per SEBI Circular No. CIR/CFD/FAC/62/2016 dated 5th July, 2016, the timeline for submitting the financial results (as per Ind AS, 2015 for the first time) in compliance with the provisions of the said Circular is extended by one month for September quarter. Hence, the due date for submission of the results for the quarter ended on 30th September, 2020 was 14thDecember, 2020. Accordingly, the Unaudited Financial Results for the quarter ended on 30thSeptember, 2020 has been submitted on 14thDecember, 2020 after its approval at the Board Meeting held on 14thDecember, 2020.</p> <p>The said facts has also been informed to NSE vide Company's letters dated 11th November, 2020 (prior to submission of results as precaution), December 15, 2020 and January 6, 2021 (in response to letters of NSE).</p>	31-03-2021	The Company has paid penalty as levied by National Stock Exchange of India Limited.	The Company has paid penalty as levied by National Stock Exchange of India Limited.



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<p>The Company is of firm conviction that there is no delay in submitting Unaudited financial results for the quarter ended on 30th September, 2020 on 14th December, 2020, and also there is no Non-Compliance of Regulation 33 of SEBI (LODR) Regulation, 2015.</p>			
<p>We are not in a position to independently verify the claim.</p>			

FOR KASHYAP R. MEHTA & ASSOCIATES
COMPANY SECRETARIES



Date: 9th May, 2022
Place: Ahmedabad

KASHYAP R. MEHTA
PROPRIETOR
FCS-1821 : COP-2052: PR-583/2019
FRN: S2011GJ166500
UDIN: F001821D000288228

Notes:

- i. Due to COVID-19 pandemic, we have conducted the assignment by examining the Secretarial Records including minutes, documents, Registers and other records etc., and some of them received by way of electronic mode from the Company and could not be verified from the original records. The management has confirmed that the records submitted to us are true and correct.
- ii. This Report is limited to the Statutory Compliances on laws / regulations / guidelines listed in our report which have been complied by the Company up to the date of this Report pertaining to Financial Year 2021-22. We are not commenting on the Statutory Compliances whose due dates are extended by Regulators from time to time due to COVID-19 or still there is time line to comply with such compliances.