

Ref: DIL/SEC/2021-22/11  
Date: June 29, 2021

The Listing Manager  
**BSE Limited,**  
Phiroze Jeejeebhoy Towers,  
Dalal Street,  
**Mumbai-400 001**

**Telephone no: +91 22 2272 1233/1234**  
**Fax no: +91 22 2272 1919**

**BSE Scrip Code: 500068**  
**Name of the Company: Disa India limited**

Dear Sir,

**Subject: Annual Secretarial Compliance Report for the year ended March 31, 2021.**

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, and in compliance with Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019, we are filing herewith the Annual Secretarial Compliance Report issued by Mr. Vijayakrishna K T, Practising Company Secretary, for the financial year ended March 31, 2021.

We had filed this document with you on June 18, 2021 vide acknowledgement number 2895743. However, inadvertently wrong document was attached. Hence, it is being filed again with correct attachment.

This is for your information and records.

Yours sincerely,

**For Disa India Limited**



**G Prasanna Bairy**  
Company Secretary & Compliance Officer

**Encl: As above**

## DISA India Limited

Registered & Corporate Office:  
6<sup>th</sup> Floor, S-604, World Trade Center (WTC), Brigade Gateway Campus, 26/1,  
Dr Rajkumar Road, Malleswaram-Rajajinagar, Bangalore-560 055, Karnataka, India  
T: +91 80 2249 6700 – 03 | F: +91 80 2249 6750 | E: bangalore@noricangroup.com  
W: www.noricangroup.com  
CIN: L85110KA1984PLC006116 | GST: 29AAACG5030F1ZY

Regional Sales:  
**New Delhi:** delhi@noricangroup.com  
**Kolkata:** kolkata@noricangroup.com  
**Pune:** pune@noricangroup.com  
**Parts & Services:** cdc.india@noricangroup.com

Manufacturing Facility:  
**Tumkur:** No. 28-32, Satyamangala Industrial Area, Tumkur – 572104, Karnataka, India.  
T: +91 816 6602000/01, E: tumkur@noricangroup.com  
**Hosakote:** Plot no 50, KIADB Industrial Area, Hosakote – 562114, Karnataka, India.  
T: +91 80 279171310/27971516. E: hosakote@noricangroup.com

**VIJAYAKRISHNA K T**

BBM, LLB, FCS, ACMA

Company Secretary

# 496/4, II Floor, 10th Cross  
Near Bashyam Circle, Sadashivanagar,  
Bangalore - 560 080, INDIA  
Tel : +91 80 23610847, 41231106  
e-mail : vijaykt@vjkt.in  
ktvijaykrishna@gmail.com

**SECRETARIAL COMPLIANCE REPORT OF  
DISA INDIA LIMITED  
FOR THE YEAR ENDED 31<sup>ST</sup> MARCH, 2021**

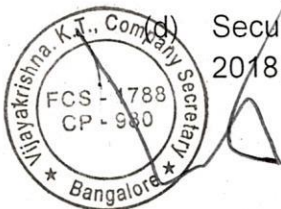
I, Vijayakrishna K T, Practising Company Secretary, have examined all the documents and records made available to us and explanation provided by DISA INDIA LIMITED bearing CIN L85110KA1984PLC006116 and having its Registered Office at World Trade Center (WTC), 6th Floor, Unit No. S-604, 26/1, Dr Rajkumar Road, Malleswaram-Rajajinagar, Bengaluru, Karnataka, 560055 ("the listed entity"), the filings/submissions made by the listed entity to the stock exchanges, website of the listed entity and other document/filing and as may be relevant, which has been relied upon to make this certification for the Financial Year ended 31st March, 2021 ("1<sup>st</sup> April, 2020 to 31<sup>st</sup> March, 2021") 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, 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;

Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;



- (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;
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Circulars/Guidelines issued there under.

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 except in respect of matters specified below:

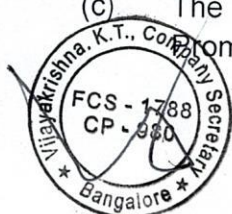
Sl. No.	Compliance Requirement (Regulations/circulars/Guidelines including specific clause)	Deviations	Observations/Remarks of the Practicing Company Secretary
NIL*			

\*The proceedings of the Annual General Meeting was submitted to Stock Exchange immediately on the next working day, marginally after 24 hours, which in my opinion, is non-material and inconsequential.

\*With relation to regulation 3 (5) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, the Listed Entity represented that it has robust prevailing system for tracking of sharing the Un-published Price Sensitive Information (UPSI) and is in the process of establishing Structured Digital Database (SDD) in software format.

- (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 of violation	Details of action taken ex. Fines, warning letter, debarment etc.	Observations/Remarks of the Practising Company Secretary, if any
NIL				

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

(e)

Sl. No.	Observations of the Practising 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 Practising Company Secretary on the actions taken by the listed entity
NIL				

Place: Bengaluru  
Date: 20.05.2021



*[Signature]*  
Vijaykrishna K T  
Practising Company Secretary  
FCS No.: 1788 C P No.: 980  
UDIN:F001788C000349762