

June 24, 2021

To,
Listing Department
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai - 400 001.

Scrip Code: 526586

Scrip ID: WIMPLAST

Sub: Annual Secretarial Compliance Report for the financial year ended 31st March, 2021

Dear Sir/ Madam,

Pursuant to the Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended and read with SEBI Circular No. CIR/CFD/CMDI/27/2019 dated February 08, 2019, please find enclosed the 'Annual Secretarial Compliance Report' of the Company for the financial year ended 31st March 2021 issued by HS Associates, Practicing Company Secretaries, Mumbai.

This is for your information and records.

Thanking you.

Yours faithfully,

For Wim Plast Limited

Darsha Adodra



Darsha Adodra
Company Secretary & Compliance Officer
(ACS No.: 32331)

End: A/a

Secretarial Compliance Report of Wim Plast Limited for the year ended 31st March, 2021

To
Board of Directors
Wim Plast Limited
Cello House, Corporate Avenue,
1st Floor, 'B' Wing, Sonawala Road,
Goregaon (East), Mumbai – 400 063.

I Hemant Shetye, Partner of HS Associates have examined:

- a) all the documents and records made available to me and explanation provided by Wim Plast 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, 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 for the period under review;**
- (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 for the period under review;**



- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; - **not applicable for the period under review;**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; - **not applicable for the period under review;**
- (g) Securities and Exchange Board of India (Issue and Listing of Nonconvertible and Redeemable Preference Shares) Regulations, 2013; - **not applicable for the period under review;**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) SEBI (Depositories and Participants) Regulations, 2018 erstwhile SEBI (Depositories and Participants) Regulations, 1996;
- (j) Annual Secretarial audit report and annual secretarial compliance report for listed entities as per SEBI circular CIR/CFD/CMD1/27/2019 dated February 08, 2019;
- (k) Disclosure of reasons for delay in submission of financial results by listed entities as per SEBI circular CIR/CFD/CMD-1/142/2018 dated November 19, 2018;
- (l) Standardised norms for transfer of securities in physical mode SEBI/HO/MIRSD/DOS3/CIR/P/2018/139 dated November 6, 2018;
- (m) Strengthening the Guidelines and Raising Industry standards for RTAs, Issuer Companies and Banker circular no. SEBI/HO/MIRSD/DOS3/CIR/P/2018/115 dated July16, 2018 read with SEBI circular no. SEBI/HO/MIRSD/DOP1/CIR/P/2018/73 dated April 20, 2018;
- (n) Standard Operating Procedure for suspension and revocation of trading of specified securities circular no. SEBI/HO/CFD/CMD/CIR/P/2018/77 dated May 3, 2018 - **not applicable for the period under review;**
- (o) System-driven Disclosures in Securities Market as per SEBI circular SEBI/HO/CFD/DCR1/CIR/P/2018/85 dated May 28, 2018;
- (p) Monitoring of Foreign Investment limits in listed Indian companies SEBI circular IMD/FPIC/CIR/P/2018/74 dated April 27, 2018 read with SEBI Circular No. IMD/FPIC/CIR/P/2018/61 dated April 5, 2018;
- (q) Disclosures by listed entities of defaults on payment of interest/ repayment of principal amount on loans from banks / financial institutions, debt securities, as per SEBI circular CIR/CFD/CMD/93/2017 dated August 4, 2017 - **not applicable for the period under review;**
- (r) Database for Distinctive Number (DN) of Shares as per SEBI circular SEBI/HO/MRD/DOP2DSA2/CIR/P/2019/87 dated August 01, 2019;
- (s) Disclosure of significant beneficial ownership in the shareholding pattern as per SEBI circular SEBI/HO/CFD/CMD1/CIR/P/2019/36 dated March 12, 2019;



- (t) Framework for listing of Commercial Paper as per SEBI circular SEBI/HO/DDHS/DDHS/CIR/P/2019/115 dated 22nd October 2019 read with Non-compliance with provisions related to continuous disclosures as per SEBI Circular no. SEBI/HO/DDHS/DDHS/CIR/P/2020/231 dated November 13, 2020 - **not applicable for the period under review;**
- (u) Resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI circular CIR/CFD/CMD1/114/2019 dated October 18, 2019 - **not applicable for the period under review;**
- (v) Disclosure of standardizing reporting of violations related to code of conduct under SEBI (PIT), 2015 as per SEBI Circular HO/ISD/ISD/CIR/P/2019/82 dated 19th July, 2019;
- (w) Violation of Insider Trading SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020;
- (x) E-VOTING Facility as per SEBI Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/242 dated December 09, 2020
- (y) Operational guidelines for Transfer and Dematerialization of re-lodged physical shares as per SEBI Circular No. SEBI/HO/MIRSD/RTAMB/CIR/P/2020/166 dated September 07, 2020
- (z) Handling of Scores Complaints as per SEBI Circular No. SEBI/HO/OIAE/IGRD/CIR/P/2020/152 dated 13 August, 2020.
- (aa) Automation of System Driven Disclosures as per SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/168 dated September 09, 2020

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 thereunder.
- (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/our examination of those record.
- (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:

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.
1	Not Applicable			



(d) The listed entity has taken the following actions to comply with the observations made in 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 on March 31, 2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	<p>Observations mentioned in Annual Secretarial Compliance Report for 31st March, 2019:</p> <p>Not Applicable since the Company has taken sufficient steps and addressed the raised observations.</p>	<p>Observations mentioned in Annual Secretarial Compliance Report for 31st March, 2020:</p> <p>The Listed Entity shall disclose details pertaining to significant beneficial owners in its Shareholding Pattern Report. However, in the Report Submitted to the Stock Exchange for Quarter ended 30th June, 2019, "Whether the Company has Significant Beneficial Owner has been identified" entered as No.</p>	<p>On the Observations made by PCS in the Annual Secretarial Compliance Report for 31st March, 2020.</p> <p>The Company has identified Significant Beneficial Owners, however, in the Report Submitted to the Stock Exchange for Quarter ended 30th June, 2019, the same has been erroneously entered as No.</p>	<p>On the Observations made by PCS in the Annual Secretarial Compliance Report for 31st March, 2020.</p> <p>Non-occurrence of said default during the Period under review.</p>
2.	NA	<p>The promoters were required to disclose to the Company the number of securities acquired or disposed of within two working days of such transaction where the transaction exceeds Rs. Ten lakhs in a Calendar Quarter; however, there were two transactions where the same was intimated beyond the stipulated period.</p>	<p>The Inter-Se Transactions entered into by the promoters were intimated with delay by the promoters.</p>	<p>Non-occurrence of said default during the Period under review.</p>
3.	NA	<p>The promoters were required to disclose to the Company any change in their shareholding exceeding two percent of shares or voting rights of</p>	<p>The Inter-Se Transactions entered into by the promoters were intimated with delay by the promoters.</p>	<p>Non-occurrence of said default during the Period under review.</p>



		the Company, however there were two transactions where the same was intimated beyond the stipulated period.		
4.	NA	The details of proposed acquisition required to be provided to the stock exchange under Regulation 10 (5), and the report to be filed with the stock exchange as per Regulation 10 (6) were provided beyond the stipulated time.	The Inter-Se Transactions entered into by the promoters were intimated with delay by the promoters.	Non-occurrence of said default during the Period under review.

Note:

1. This report is based on the following:
 - A) Data received from the Company partially through electronic mode as physical verification of the data and corresponding documents could not be accessed during the course of audit due to the COVID-19 pandemic and restrictions imposed by the Maharashtra Government and local authorities.
 - B) Compliances required to be done by the Company during the Financial Year ended 31st March, 2021 (i.e. the period covered for the purpose of this Report is from 01st April, 2020 to 31st March, 2021)
2. There was no event of appointment/ re-appointment/ resignation of statutory auditor of the Company during the review period and the Company has suitably modified the terms of appointment of its existing statutory auditor to comply with clause 6(A) and 6(B) of Circular No. CIR/CFD/CMD1/114/2019 dated 18th October, 2019 issued by SEBI.

Place: Mumbai
 Date: June 11, 2021
 ICSI UDIN: F002827C000448393

For HS Associates
 Company Secretaries



(Signature)
 Hemant S. Shetye
 Partner
 FCS No.: 2827
 COP No.: 1483