



AARON Industries Limited

(CIN-L31908GJ2013PLC077306)

Registered Office & Unit-1: B-65 & 66, Jawahar Road No. 4, Udhyog Nagar, Udhana, Surat -394210, Gujarat.
Unit -2 : Block No. 251-B, Royal Industrial Park, Vill- Moti Pardi, Ta. Magrol, Surat - 394120, Gujarat.
Tel:- 0261-2278410, E-Mail:- info1@aaronindustries.net, Website:- www.aaronindustries.net

18th June, 2021

To,
The Manager - Listing Department
National Stock Exchange of India Limited
Exchange Plaza, Bandra Kurla Complex,
Bandra (East), Mumbai - 400051

Symbol: AARON

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

Dear Sir/Madam,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time and read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019; we enclosed herewith the Annual Secretarial Compliance Report of the Company for the year ended 31st March, 2021, issued by Mr. Dhiren R. Dave, Practicing Company Secretary, Surat.

This is for your information and record.

Thanking you.

Yours faithfully,

For Aaron Industries Limited

N.N. Maniya

Nitinkumar Maniya

Company Secretary & Compliance Officer



Encl.: As above



Dhiren R. Dave

B.Com., LL.B., FCS, AICS (U.K.)

COMPANY SECRETARY

B-103, International Commerce Centre, Near Kadiwala School, Ring Road, Surat-395 002, (Gujarat) INDIA.

Tele : 0261-2460903, 2475122 (M) 98241 15061

Website : www.drdcs.net E-mail : drd@drdcs.net

**Secretarial Compliance Report
Of
Aaron Industries Limited
For The Financial Year Ended 31st March, 2021**

To
The Members,
Aaron Industries Limited
B-65 & 66, Jawaharlal Road No. 4, Udhog Nagar,
Udhana, Surat-394210, Gujarat, India

I Dhiren R Dave, Practicing Company Secretary, have examined:

- (a) all the documents and records made available to us and explanation provided by Aaron Industries 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 31-03-2021 ("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 there under ; and



Date : 14.06.2021

UDIN: F004889C000455691

- (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 (Prohibition of Insider Trading) Regulations, 2015;

There are no events occurred during the year which attracts provisions of following regulations hence they are not applicable.

- (e) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
- (f) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (g) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;



Date : 14.06.2021

(h) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;

(i) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009

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 specified below:-

Sr. No.	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1	Regulation 34 of SEBI (Listing of Obligations and Disclosure Requirements) Regulations, 2015.	Delay in submission of Annual Report for the Year 2019-20.	Delay of 13 days in submission of Annual Report for the Year 2019-20 to NSE.

(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.



Date : 14.06.2021

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UDIN: F004889C000455691

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	National Stock Exchange of India Limited	Delay in submission of Annual Report for the Year 2019-20: Regulation 34 of the Listing Regulations	Fine of Rs. 30,680/- imposed by NSE vide notice dated 08.01.2021.	Company has applied for waiver of penalty vide letter dated 22.01.2021 but no reply received till date.

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

Not Applicable being first year of reporting.

Place: SURAT
Date: 14.06.2021


DHIREN R. DAVE
COMPANY SECRETARY
FCS:4889
CP :2496
UDIN: F004889C000455691

Date : 14.06.2021