



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. Mangrol, Surat - 394120, Gujarat.

Tel:- 0261-2278410, E-Mail:- info1@aaronindustries.net, Website:- www.aaronindustries.net

May 25, 2022

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

Symbol: AARON

Sub: Annual Secretarial Compliance Report for the Financial Year ended March 31, 2022

Dear Sir/Madam,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019, we enclosed herewith the Annual Secretarial Compliance Report of the Company for the Financial Year ended March 31, 2022, issued by M/s. Dhiren R. Dave & Co., Practicing Company Secretaries, Surat.

The above document is also available on the Company's website www.aaronindustries.net.

This is for your information and records.

Thanking You.

Yours faithfully,
For Aaron Industries Limited

N. N. Maniya

Nitinkumar Maniya

Company Secretary & Compliance Officer



Encl.: As above

DHIREN R. DAVE & CO.

Company Secretaries

B-103, International Commerce Center (ICC), Near Kadiwala School,
Ring Road, SURAT- 395002, Phone: 0261-2460903, 2475122, 9824115061,
Email:contact@drdcs.net

**Secretarial Compliance Report
Of
Aaron Industries Limited
For The Financial Year Ended 31st March, 2022**

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

We, M/s Dhiren R Dave & Co., Practicing Company Secretaries, 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 31-03-2022 ("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")

Date : 25.05.2022

1



UDIN: A028554D000381082

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 (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (c) 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.

- (d) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (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;
- (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, 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 matter specified below:-

Date : 25.05.2022

2



UDIN: A028554D000381082

Sr. No.	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1	Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015. Schedule B read with Regulation 9(1) of SEBI (Prohibition of Insider Trading) Regulations, 2015	Transaction undertaken by Designated Person during the Trading Window Closure period and also falls under contra trade within a period of six months.	Company has reported the violations to Stock Exchange as per SEBI circular on 03.03.2022 and also issued warning letter to DP on 03.03.2022.

(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 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.
1	National Stock Exchange of India Limited	Difference in SDD (System Driven Disclosures and SHP (Shareholding pattern))	Clarification was asked by NSE vide letter dated 25.02.2022.	Company has replied vide letter dated 03.03.2022 and also filed revised Shareholding pattern for 30.09.2021 and 31.12.2021.



Date : 25.05.2022

3

UDIN: A028554D000381082

(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...	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	Delay of 13 days in submission of Annual Report for the Year 2019-20 to NSE and Fine of Rs. 30,680/- imposed by NSE vide notice dated 08.01.2021	2020-21	Company has applied for waiver of penalty vide letter dated 22.01.2021 and Fine was waived by NSE vide letter dated 20.07.2021.	Compliance checked and found ok.

Place: SURAT
Date: 25.05.2022

For DHIREN R. DAVE & CO.,
COMPANY SECRETARIES
UIN: P1996GJ002900

P/R No. : 2144/2022




PINAL KANDARP SHUKLA
Partner

ACS:28554, CP :10265
UDIN: A028554D000381082