

No. JKCL/SE/SCR-21-22/2022-23

Date 16/05/2022

Bombay Stock Exchange Ltd.
Phiroze Jeejeebhoy Towers,
Dalal Street
Mumbai-400 051
Scrip Code- 532644

National Stock Exchange of India Ltd.
Exchange Plaza
Bandra- Kurla Complex
Mumbai-400 051
Scrip Code-JKCEMENT

Dear Sir,

Subject: Submission of Annual Secretarial Compliance Report for the Financial Year 2021-22

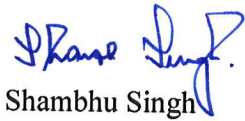
Pursuant to SEBI Circular dated February 8, 2019, all listed entities are required to submit to the Stock Exchange within stipulated time, Annual Secretarial Compliance Report, issued by a practising Company Secretary.

Accordingly, we are attaching herewith the Annual Secretarial Compliance Report of the Company issued by M/s. Reena Jakhodia & Associates, Practising Company Secretaries, for the Financial year 2021-22.

Please take the same on record and oblige.

Yours Faithfully

For J.K. Cement Ltd.



Shambhu Singh

Vice- President(Legal) &
Co. Secretary.

Encls: As above



Corporate Office

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- ✉ admin.padamtower@jkcement.com
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JK SUPER
CEMENT
BUILD SAFE

JK CEMENT
WallMax X
White Cement Wall Putty

Manufacturing Units at :

Nimbahera, Mangrol, Gotan (Rajasthan) | Muddapur (Karnataka)
Jharli (Haryana) | Katni (M.P.) | Aligarh (U.P.) | Balasinor (Gujarat)





104A/47, Ram Bagh, Kanpur - 208 012
Phone: +91 – 9935902244, 9336205217

Secretarial Compliance Report

JK CEMENT LTD.

for the year ended 31st March, 2022

To,
The Members,
J. K. Cement Limited,
Kamla Tower,
Kanpur.

I Reena Jakhodia have examined:

(a) all the documents and records made available to us and explanation provided by the management of **JK CEMENT LTD.** (L17229UP1994PLC017199) (herein referred to as “the listed entity” or “the Company”.)

(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, 2022 (“Review Period”) in respect of compliance under the provisions of:

(a) the Securities and Exchange Board of India Act, 1992 (“SEBI Act”) and Rules, 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 Rules and 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;

For Reena Jakhodia & Associates


Company Secretaries
CP No. 6083



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- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeover) Regulations, 2011;
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; (Not Applicable to the Company during the Audit Period)
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (Not Applicable to the Company during the Audit Period)
- (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; (Not Applicable to the Company during the Audit Period)
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018
- (j) SEBI/RBI guidelines for issuance and listing of Commercial Papers.
- (k) Any other Acts/Rules/ Regulations as may be applied to the Listed Entity.

and circulars/guidelines issued thereunder 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, except in respect of matters specified below:-

Sr.No	Compliance Requirement (Regulations/ guidelines including specific clause)	Requirement circulars/ specific	Deviations	Observations! Remarks of the Practicing Company Secretary
	NIL		NIL	NIL

(b) The listed entity has maintained proper records under the provisions of the above Rules, Regulations and circulars/ guidelines issued thereunder insofar as it appears from my/our examination of those records.

For Reena Jakhodia & Associates

Company Secretaries
CP No. 6083



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(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/Rules/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.
NIL				

(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 reports	Observations made in the secretarial compliance report for the year ended (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	Non Compliance of Regulation 23(9) of SEBI LODR, Regulation 2015 about timely not disclosing Related party transactions on consolidated basis.	For year ended 31.03.2021, It was filed and sought waiver of fine on 19.01.2021	Sought to impose fine of Rs. 2 Lakhs plus GST.	On filing representation by the company penalty has been waived by BSE and NSE.

For Reena Jakhodia & Associates

Company Secretaries
CP No. 6083



REENA JAKHODIA & ASSOCIATES

Company Secretaries

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I, Further report that as per clause 6(A) and 6(B) of the circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019 issued by the Securities and Exchange Board of India on "Resignation of Statutory Auditors from listed entities and their material subsidiaries" is not applicable during the Audit Period.

Place: Kanpur

Date: 29.04.2022

For Reena Jakhodia & Associates

Company Secretaries
CP No. 6083

For: Reena Jakhodia & Associates
Company Secretaries
(Reena Jakhodia)
Proprietor
Membership No: F6435
C.P. No.: 6083
UDIN: F006435D000237041