



**INDUSTRIAL  
INVESTMENT  
TRUST  
LIMITED**

June 29, 2021

The Manager  
Listing Department  
BSE Limited  
Dalal Street  
Mumbai – 400 001

The Manager  
Listing Department  
The National Stock Exchange of India Limited  
Exchange Plaza, 5<sup>th</sup> Floor  
Plot No. C/1, G Block  
BKC, Bandra (E), Mumbai 400 051

**BSE Code: 501295**

**NSE Scrip Symbol: IITL**

**Sub.: Annual Secretarial Compliance Report of the Company for the year ended  
March 31, 2021**

**Ref.: SEBI Circular CIR/CFD/CMDI/27 /2019 dated 08.02.2019 & Regulation 24A of  
SEBI (LODR) Regulations, 2015**

Dear Sir,

Pursuant to SEBI Circular CIR/CFD/CMDI/27 /2019 dated February 08, 2019 & Regulation 24A of SEBI (LODR) Regulations, 2015, please find enclosed herewith the Annual Secretarial Compliance Report for the year ended March 31, 2021

Thanking you,

Yours faithfully,  
For **Industrial Investment Trust Limited**

**Cumi Banerjee  
CEO & Company Secretary**

Encl: A/a

CIN No. L65990MH1933PLC001998

**Regd. Office :** Office No. 101A, "The Capital", G-Block, Plot No. C-70, Bandra Kurla Complex,  
Bandra (East), Mumbai -400051. • Tel.: (+91) 22-4325 0100  
Email : iitl@iitlgroup.com • Website : www.iitlgroup.com

**SECRETARIAL COMPLIANCE REPORT OF INDUSTRIAL INVESTMENT TRUST  
LIMITED FOR THE YEAR ENDED MARCH 31, 2021**

We, Chandanbala Jain and Associates have examined:

- (a) all the documents and records made available to us and explanation provided by **Industrial Investment Trust Limited (CIN: L65990MH1933PLC001998)** (“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 documents / filing, as may be relevant, which has been relied upon to make this certification,

for the year ended March 31, 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 during the review period**
- (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 during the review period**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; - **Not applicable during the review period**

- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; - **Not applicable during the review period**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; - **Not applicable during the review period**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993; - **Not applicable during the review period**
- (j) Securities and Exchange Board of India (Intermediaries) Regulations, 2008; - **Not applicable during the review period**
- (k) Any other regulations, circulars, guidelines etc. issued by SEBI and applicable to the Company.

and based on the above examination and considering the relaxations granted by the Ministry of Corporate Affairs and Securities and Exchange Board of India warranted due to the spread of the COVID-19 pandemic, 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 thereunder, **except** in respect of matters specified below:

<b>Sr. No.</b>	<b>Compliance Requirement (Regulations / circulars / guidelines including specific clause)</b>	<b>Deviations</b>	<b>Observations / Remarks of the Practicing Company Secretary</b>
None			

- (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 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 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.
None				

(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 .... (The years are to be mentioned)	Action taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	The Company had filed the Financial Results for Quarter ending June 30, 2019 under Regulation 33 of the SEBI Listing Obligations and Disclosure Requirements, 2015 with a delay of 4 days after the period of 45 days.	2019-2020	The Company endeavors to comply with the Regulations on time.	No such non-compliance was observed during the year under review 2020-2021

**Notes:**

1. Maintenance of secretarial records is the responsibility of the management of the company. My responsibility is to express an opinion on these secretarial records based on my audit.

2. Due to the COVID - 19 pandemic and the restrictions faced due to the same, physical verification of documents / records have been impacted and hence reliance has been placed on the scanned / soft copies of various documents / records which were provided by the Company.

For **Chandanbala Jain and Associates**  
Practicing Company Secretaries

CHANDAN  
BALA OJAS  
MEHTA

Digitally signed by CHANDANBALA OJAS  
DN: cn=Personal, postalCode=400026,  
o=Chandanbala  
+91 98212 85437, email=joinchandan13@yaho  
o.com, ou=CHANDANBALA OJAS MEHTA  
400014, c=IN

Chandanbala O. Mehta  
Proprietor

Membership No.: FCS 6122

C P No.: 6400

Place: Mumbai  
Date : June 25, 2021

**UDIN: F006122C000517952**

**Correspondence Office :**  
#3, 1st Floor, 20/24 Morarji Velji Bldg.,  
Dr. M.B. Velkar Street, Kolbhat Lane,  
Kalbadevi Road, Mumbai 400 002.

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D-606, Simla House, 6th Floor, L.J Marg,  
Off Nepeansea Road, Near PDP Garden  
& Hyderabad Estates, Mumbai - 400 026.

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