



**The
Waterbase
Limited**

Corporate Office :

Thapar House | 37 Montieth Road
Egmore | Chennai | 600008 | India.

T: +91 44 45661700

F: +91 44 45661799

www.waterbaseindia.com

May 24, 2022

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

Ref: Scrip Code: 523660 / WATERBASE

Dear Madam / Sir,

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

Pursuant to Regulation 24A of SEBI (Listing Obligations & Disclosures Requirements) Regulations, 2015, the Annual Secretarial Compliance Report dated May 24, 2022 for the year ended March 31, 2022 issued by M/s Rengarajan & Associates, Practicing Company Secretaries is attached herewith.

You are requested to take the information on record.

Thanking you
For The Waterbase Limited

T.B. Srikanth

T.B.Srikanth
Company Secretary & Compliance Officer



Registered Office / Factory:

Ananthapuram Village | T.P. Gudur Mandal | Nellore | Andhra Pradesh | 524344.

T: +91 70759 33457 | E: info@waterbaseindia.com | CIN: L05005AP1987PLC018436





RENGARAJAN & ASSOCIATES

(Formerly ARUB & Associates)

No. 8/9, SUS Enclave, Raman Street Chitalapakkam, Chennai 600064

E-mail: rengarajancsassociates@gmail.com | Mob. 9381011200

SECRETARIAL COMPLIANCE REPORT OF THE WATERBASE LIMITED (CIN L05005AP1987PLC018436) FOR THE YEAR ENDED MARCH 31, 2022

We Rengarajan & Associates, Practising Company Secretaries, have examined:

- (a) all the documents and records made available to us and explanation provided by The Waterbase 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 March 31, 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 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 and Sweat Equity) Regulations, 2021;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (not applicable during the Review Period);



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- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations (not applicable during the Review Period);
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

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 thereunder,
- (b) The listed entity has maintained proper records under the provisions of the afor above Regulations and circulars/ guidelines issued thereunder in so far as it appears from our examination of those records.
- (c) There were **no 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 in so far as appears from my examination of those records.
- (d) The listed entity has taken the following actions to comply with the observations made in previous report:

Sl. 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)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	The Trading Window of the company for dealing in Company's securities was closed for Designated Persons and their Immediate Relative(s) with	2020-21	The Board in its Director's Report has informed that delay in the intimation to Stock Exchange on the closure of Trading Window was an inadvertent delay. However, all designated persons were duly intimated	We have noted that the company has duly intimated all its insiders / designated persons on the closure of Trading Window on 31 st Dec 2020 however had inadvertently missed out in intimating the same to Stock



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<p>effect from 01st January 2021 till the end of 48 hours after the declaration of financial results for the quarter ended 31st December 2020. The intimation regarding closure trading window was made only on 7th January, 2021. However, same should have been done prior to the closure of trading window i.e. 1st January, 2021</p>		<p>on 31st Dec 2020 itself on the closure of the Trading Window and the delay was only w.r.t. intimation to Stock Exchange.</p>	<p>Exchange on 31st Dec 2020 and did the same subsequently on Jan 7, 2021.</p>
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For **Rengarajan & Associates**, Company Secretaries
(Formerly ARUB & Associates)
Firm Registration No. S2005TN847100

DATE: 24.05.2022
PLACE: Chennai

A Rengarajan
Proprietor
FCS:6725, CP: 13437
UDIN Number: F006725D000374631