



# UNITED DRILLING TOOLS LTD.

CIN : L29199DL1985PLC015796

OIL DRILLING EQUIPMENT MANUFACTURING AND SERVICES

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: 4221777

Fax No. : -91-0120-2462675

**USE PREFEX FOR CALLING -**

From out side Country -91-120

From out side State -0120

From New Delhi -0120

**Please Reply to Head Office**

A-22, Phase-II, Noida-201305

Distt. Gautam Budh Nagar,

Uttar Pradesh, India

E-mail : ENQUIRY@UDTLTD.COM

Website : WWW.UDTLTD.COM

28/05/2022

UDT/SEC/2022-23/BSE-20-NSE-20

To  
Department of Corporate Service  
BSE Limited  
Phiroze Jeejeebhoy Towers,  
Dalal Street, Mumbai- 400001  
Security ID - 522014

Listing Compliance Department  
National Stock Exchange of India Ltd.  
Exchange Plaza, C-1 Block-G,  
Bandra Kurla Complex, Bandra (E),  
Mumbai - 400051  
Security ID - UNIDT

**Sub: Annual Secretarial Compliance Report**

Dear Sir/Madam,

This is with reference to SEBI Circular CIR/CFD/CMD1/27/2019 dated February 8, 2019 we are enclosing herewith Annual Secretarial Compliance Report for the FY ended March 31, 2022 duly digitally signed by M/s Balraj Sharma & Associates, Practicing Company Secretary, in compliance of regulation 24A of SEBI (LODR) Regulations, 2015.

Kindly take the same on record.

Thanking you,

Yours faithfully

For United Drilling Tools Ltd.

*Naveen*  
28/5/22  
Naveen Bhatnagar  
Company Secretary  
M. No. F-6079



# BALRAJ SHARMA & ASSOCIATES

## COMPANY SECRETARIES

206 Munish Plaza, 20 Ansari Road, Opp. Fire Station, Daryo Ganj, New Delhi-110002  
Tel : 23282565, 23254488, 23274488, Fax : 30124488, Mobile : 9810065041, E-mail : balrajsharma@yafusa.co.in

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### *Secretarial Compliance Report of United Drilling Tools Ltd*

*for the year ended 31<sup>st</sup> March, 2022*

I, Balraj Sharma of M/s Balraj Sharma & Associates, Company Secretaries have examined:

- (a) all the documents and records made available to us and explanation provided by United Drilling Tools Ltd,
- (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<sup>st</sup> March, 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 (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;

- (c) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (d) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; (Not applicable during the financial year ended 31<sup>st</sup> March, 2022)
- (e) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (Not applicable during the financial year ended 31<sup>st</sup> March, 2022)
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares Regulations, 2013; (Not applicable during the financial year ended 31<sup>st</sup> March, 2022)
- (g) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 (Not applicable during the financial year ended 31<sup>st</sup> March, 2022);
- (h) SEBI (Buy-Back of Securities) Regulations, 2018 (Not applicable during the financial year ended 31<sup>st</sup> March, 2022);

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:-

S. No.	Compliance Requirement (Regulations/ Circulars/ Guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
N.A.	N.A.	N.A.	N.A.

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far as it appears from my/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
1.	National Stock Exchange of India Ltd vide its Notice No. NSE/LIST-SOP/COMB/FINES/0832 Dt. 21.02.2022	Non-Compliance with Regulation 21(5) of the SEBI (LODR) Regulations, 2015 and Regulation 76 of SEBI (Depositories and Participants) Regulations, 2018	National Stock Exchange of India Ltd vide its Notice No. NSE/LIST-SOP/COMB/FINES/0832 Dt. 21.02.2022 have imposed a penalty of Rs 1,34,520/- (Rupees One Lakh Thirty Four Thousand Five Hundred & twenty Only) for non-compliance of Regulation 21 of the SEBI (LODR) Regulations, 2015.	As per the Reply Dt. 05.05.2022 as filed by the Company with the respective Stock Exchanges, and as per the explanations and information as produced before us, the Board of Directors in their meeting held on 08.08.2015 had approved the Constitution of Risk Management Committee

				<p>and suitable intimation was duly made to BSE. Moreover, the Risk Management Committee was re-constituted by the Board on 09.02.2022 and was duly intimated to both the BSE and NSE.</p> <p>However, with regard to non-compliance with Regulation 76 of the SEBI (D&amp;P) Regulations, as per the information and explanations as provided by the Company and its officers, the same was duly complied by the Company.</p>
2.	BSE Ltd vide its Notice No. SOP-CReview-(21-Feb-2022) Dt. 21.02.2022	Non-Compliance with Regulation 21(5) of the SEBI (LODR) Regulations, 2015 and Regulation	BSE Ltd vide its Notice No. SOP-CReview-(21-Feb-2022) Dt. 21.02.2022 have imposed a penalty of Rs 1,34,520/- (Rupees One Lakh Thirty Four Thousand Five Hundred & twenty Only) for non-compliance of Regulation	As per the Reply Dt. 05.05.2022 as filed by the Company with the respective Stock Exchanges,

		76 of SEBI (Depositories and Participants) Regulations, 2018	21 of the SEBI (LODR) Regulations, 2015.	<p>and as per the explanations and information as produced before us, the Board of Directors in their meeting held on 08.08.2015 had approved the Constitution of Risk Management Committee and suitable intimation was duly made to BSE. Moreover, the Risk Management Committee was re-constituted by the Board on 09.02.2022 and was duly intimated to both the BSE and NSE.</p> <p>However, with regard to non-compliance with Regulation 76 of the SEBI (D&amp;P) Regulations, as per the information and explanations as provided</p>
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