



Patels Airtemp (India) Limited

Ref. No. : PAT/SD/Regl.-24A/2022-23/19V
Date : 19th May, 2022

To,
BSE Limited
Corporate Relation Department
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai: 400 001

Scrip Code No. 517417 | Script Name: PATELSAI | ISIN: INE082C01024

Dear Sir/Madam,

Sub: Submission of Annual Secretarial Compliance Report for the year ended on 31st March, 2022 as per Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Pursuant to SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019 and as per Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find attached herewith Annual Secretarial Compliance Report for the financial year ended on 31st March, 2022 issued by CS Punit S. Lath, Practicing Company Secretary, Ahmedabad.

This will also be hosted on the Company's website at www.patelairtemp.com.

You are requested to take the same on record.

Thanking You,

Yours faithfully,
For Patels Airtemp (India) Limited

Nikhil M. Patel
Sr. Company Secretary
(Membership No. A6814)



Encl: As above

Works :

805, 806, 807, 810, Rakanpur 382 722,
Via : Sola - Bhadaj Village, Ta. : Kalol,
Dist. : Gandhinagar, Gujarat, India.
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Fax : +91 2764 286301
Email : works@patelsairtemp.com

www.patelairtemp.com

Regd. Office :

5th Floor, Kalpana Complex,
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Ahmedabad - 380 009. Gujarat, India.
Ph. : +91 79 27913694 / 95 / 96
Fax : +91 79 27913693
Email : project@patelsairtemp.co.in

USA Office :

Patels Airtemp (USA) Inc.

4548, Talisman St,
Torrance, CA - 90503 USA.
Ph. : 323 207 7793

E-mail : patelsairtempusa@gmail.com

ISO 9001 : 2015 COMPANY



ASME "U" / "U2" / "S"
NATIONAL BOARD "NB" / "R"
MEMBER OF : HTRI - USA

CIN NO. L29190GJ1992PLC017801

Annual Secretarial Compliance Report of
Patels Airtemp (India) Limited
(CIN: L29190GJ1992PLC017801)
for the year ended 31st March, 2022

I, Punit Santoshkumar Lath, Practicing Company Secretary have examined:

- (a) all the documents and records made available to us and explanation provided by **Patels Airtemp (India) 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 31st 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 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");

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;
- (d) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; *Not applicable, as the Company has not issued any Securities during the year under review;*
- (e) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; *Not applicable, as the Company has not bought back or propose to buy-back any of its Securities during the year under review.*



- (f) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 upto the date of 12th August, 2021 and thereafter Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 w.e.f 13th August, 2021; *Not applicable, as the Company has not issued any shares/ options to directors/ employees under the said guidelines and regulations during the year under review;*
- (g) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 upto the date of 8th August, 2021 and the Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 w.e.f 09th August, 2021; *Not applicable, as the Company has not issued any debt securities which are listed during the year under review;*
- (h) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013 upto the date of 8th August, 2021 and the Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 w.e.f 09th August, 2021; *Not applicable, as the Company has not issued any such securities during the year; and circulars/ guidelines issued thereunder;*
- (i) Securities and Exchange Board of India (Depositories and Participant Regulation), 2018;
- j) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;

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 there under as applicable to it, except in respect of matters specified below:-

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

- 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 my/our examination of those records.
- (c) No actions were 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
		Nil*		

***Note:** One of the Promoter, Mrs. Rashmikaben Patel on 20th January, 2022, sold 3000 Equity shares of the Company in an Open Market through BSE Limited i.e. during the Trading window closure period, without obtaining the preclearance of trade from Compliance Officer, and violated the requirements of "Company's Code of internal procedure and conduct of Regulating, Monitoring and Reporting of Trading by the insiders" adopted by the company, under SEBI (Prohibition of Insider Trading) Regulations, 2015.

The company on its part fulfilled all its Compliance responsibilities in the matter as under,

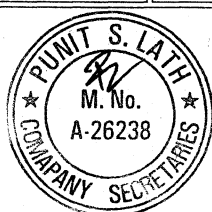
- 1) Duly made primary intimation to BSE Limited and disclosed the inadvertent trade by Mrs. Rashmikaben Patel, during the Trading window closure period.
- 2) Conducted enquiry into the matter and presented the matter before Audit Committee for proper actions on the promoter under the code of conduct. The Committee strictly warned the promoter for not to repeat the mistake again.
- 3) Submitted the Report on violation of Company's "Code of internal procedure and conduct of Regulating Monitoring and Reporting of Trading by the insiders" under the provisions of SEBI (Prohibition of Insider Trading) Regulations, 2015 in prescribed format under the regulations.
- 4) Submission of Action Taken Report to Stock Exchange under the said matter.

No non-compliance on the part of the company was noted in the matter.

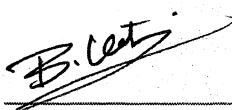
No fine is levied by the Stock Exchange on the said promoter in the matter till the date of issue of this report.

- (d) The listed entity was not required to take any actions as there was no observation made by the Practicing Company Secretary 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 end	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
		NIL		



Date: 19/05/2022
Place: Ahmedabad

Signature: 
Punit Santoshkumar Lath
Practicing Company Secretary
ACS No.: 26238, CoP No.: 11139
UDIN: A026238D000345535