



# Frontier Springs Ltd.

**REGD. OFFICE & FACTORY :** KM 25/4, KALPI ROAD, RANIA, KANPUR DEHAT - 209 304 U.P. (INDIA)  
**Tele Office :** +91-5111-240212, 240213 • **Fax :** +91-5111-240214  
**CORPORATE OFFICE :** E-14, PANKI INDUSTRIAL AREA, SITE-I, KANPUR - 208 022 U.P. (INDIA)  
**Tel. No. :** 0512-2691207, 2691208  
**e-mail :** info@frontiersprings.co.in • **Website :** http://www.frontiersprings.co.in  
**CIN No. :** L17119UP1981PLC005212

17.05.2023

To,  
The BSE Limited  
Corporate Relationship Department  
1<sup>st</sup> Floor, New Trading Wing,  
Rotunda Building, PJ, Towers,  
Dalal Street, Fort, Mumbai-400001  
Fax No.: 022-22723121, 22722037,  
Scrip Code: 522195

**Sub: Submission of Annual Compliance Report for the financial year 31.03.2023.**

Dear Sir/Ma'am,

In Compliance with the Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 08.02.2019 please find attached herewith Annual Secretarial Compliance Report issued to the Company by M/s P.Manghwani & Associates, Company Secretaries for the financial year ended 31.03.2023.

Kindly take this on record and oblige.

Thanking you,

Yours Faithfully,  
For Frontier Springs Limited

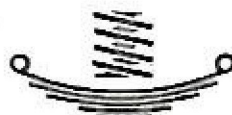
Dhruv

Bhasin

Dhruv Bhasin

(Company Secretary & Compliance Officer)

Encl's: As above



SERVING THE NATION SINCE 1980

**SECRETARIAL COMPLIANCE REPORT**  
**PURSUANT TO REGULATION 24A OF SEBI LODR, REGULATIONS, 2015**  
**FOR THE YEAR ENDED 31<sup>ST</sup> MARCH, 2023**

To,  
The Members  
Frontier Springs Ltd.  
25/4 Kalpi Road Rania Kanpur Dehat  
Kanpur Dehat UP 209304 IN

We, P. Manghwani & Associates have examined:

a) all the documents and records made available to us and explanation provided by  
Frontier Springs Limited ("the listed entity"),

**P. MANGHWANI & ASSOCIATES**  
b) the filings/submissions made by the listed entity to the stock exchanges,

c) website of the listed company,

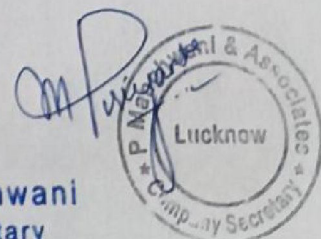
d) any other document/ filing, as may be relevant, which has been relied upon to  
make this certification,

for the financial year ended 31<sup>st</sup> March, 2023 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");

Priyanka Manghwani  
Company Secretary  
MNo. F9912  
CPNo. 12498



P.MANGHWANI & ASSOCIATES.  
COMPANY SECRETARIES

C-401,3<sup>RD</sup> FLOOR, STERLING APARTMENT,  
9 UNIVERSITY ROAD LUCKNOW-226007  
Tel: 91-860-12-88880/02 Mob: +91-723-38-88803  
Email:mcafilingservices@gmail.com  
cspriyankamanghwani@gmail.com

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; as amended from time to time;
- b) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **(Not applicable to the Company during the period under review);**
- c) The Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;**(Not applicable to the Company during the period under review);**
- d) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not applicable to the Company during the period under review);**
- e) The 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 period under review);**
- f) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- g) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;**(Not applicable to the Company during the period under review);**
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; as amended from time to time;
- i) The Securities and Exchange Board of India (Registrar to an Issue and Share Transfer Agents) Regulations, 1993, regarding the Companies Act and dealing with client and;

Priyanka Manghwani  
Company Secretary  
MNo.F9912  
CPNo.12498



- j) The Depositories Act, 1996 and the Regulations and bye-laws framed thereunder and based on the above examination,

We hereby report that, during the year under review:

- 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 Requirements (Regulations/circulars/guidelines including specific clause)	Regulation/Circular No.	Deviation	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observation/Remarks of Practicing Company Secretary	Management Response	Remarks
NIL										

- b) This listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Regulation/Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/Remarks of the Practicing Company Secretary	Management Response	Remarks
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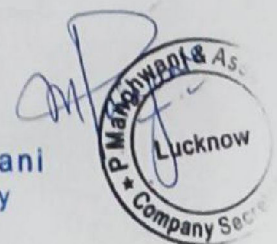


Not Applicable

c) We further affirm the status of the following compliances during the year under review:

Sr. No.	Particulars	Compliance status (Yes/No/NA)	Observations /Remarks by PCS
1.	<b><u>Secretarial Standard:</u></b> The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI)	Yes	
2.	<b><u>Adoption and timely updation of the Policies:</u></b> <ul style="list-style-type: none"> <li>All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities</li> <li>All the policies are in conformity with SEBI Regulations and has been reviewed &amp; timely updated as per the regulations/circulars/guidelines issued by SEBI</li> </ul>	Yes	
3.	<b><u>Maintenance and disclosures on Website:</u></b> <ul style="list-style-type: none"> <li>The Listed entity is maintaining a functional website</li> <li>Timely dissemination of the documents/information under a separate section on the website</li> <li>Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which redirects to the relevant document(s)/ section of the website</li> </ul>	Yes	
4.	<b><u>Disqualification of Director:</u></b>	Yes	

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Company Secretary  
MNo. F9912  
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 Tel: 91-860-12-88880/02 Mob: +91-723-38-88803  
 Email: mcafilingservices@gmail.com  
 cspriyankamanghwan@gmail.com

	None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013		
5.	<b><u>To examine details related to Subsidiaries of listed entities:</u></b>  (a) Identification of material subsidiary companies (b) Requirements with respect to disclosure of material as well as other subsidiaries	Yes	
6.	<b><u>Preservation of Documents:</u></b>  The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival Policy prescribed under SEBI LODR Regulations, 2015	Yes	
7.	<b><u>Performance Evaluation:</u></b> The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations	Yes	
8	<b><u>Related Party Transactions:</u></b>  (a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions (b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit committee	Yes	
9	<b><u>Disclosure of events or information:</u></b>  The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015	Yes	

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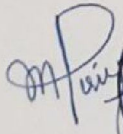
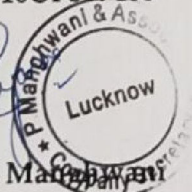
	within the time limits prescribed thereunder		
10.	<b><u>Prohibition of Insider Trading:</u></b> The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	Yes	
11	<b><u>Actions taken by SEBI or Stock Exchange(s), if any:</u></b> No Actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder	Yes	
12	<b><u>Additional Non-compliances, if any:</u></b> No any additional non-compliance observed for all SEBI regulation/circular/guidance note etc.	Yes	

P. MANGHWANI & ASSOCIATES

For P. Manghwani & Associates

Company Secretaries

FRN: S2016UP357400

Priyanka Manghwani  
(Proprietor)

C.P. No: 12498

M. No: F9912

UDIN: F009912E000152881

Date: 20/04/2023

Place: Lucknow