



PUSHPSONS INDUSTRIES LTD.

CIN # : L74899DL1994PLC059950

B-40, Okhla Ind. Area, Phase-I,
New Delhi-110020 (INDIA)

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Date: - 29.05.2019

To

BSE Limited
General Manager- Marketing Operation/ Listing
25, Phiroz Jeejeebhoy Tower
Dalal Street,
Mumbai -400001

Dear Sir/Madam,

Sub: **Submission of Annual Secretarial Compliance Report for year ended 31st March, 2019**

In compliance of Regulation 24A of SEBI (LODR) Regulations, 2015, Company has appointed M/s Anand Nimesh & Associates, Practicing Company Secretaries, to issue Annual Secretarial Compliance Report for the financial year ended on 31 March, 2019. They have carried out the required audit and submitted Annual Secretarial Compliance Report. We are enclosing the copy of the same for your record please.

Thanking you

Yours faithfully,
For Pushpsons Industries Ltd

Geeta Rawat
Company Secretary

M. No- A40126

Add- E- 349/L, Sangam Vihar, New Delhi-110062





Anand Nimesh & Associates

(Company Secretaries)

183B, Gali No-8, Second Floor, Gurudwara Road
West Guru Angad Nagar, Laxmi Nagar, Delhi-110092
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SECRETARIAL COMPLIANCE REPORT OF PUSHPSONS INDUSTRIES LIMITED FOR THE YEAR ENDED 31ST MARCH 2019

We, M/s Anand Nimesh & Associates, have examined:

- all the documents and records made available to us and explanation provided by Pushpsons Industries Limited ("the listed entity"),
- the filings/ submissions made by the listed entity to the stock exchanges,
- website of the listed entity,
- Any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31st March 2019 ("Review Period") in respect of compliance with the provisions of:

- The Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued there under; and
- 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:-

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **Not Applicable During year under review**
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **Not Applicable During year under review**

- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **Not Applicable During year under review**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Not Applicable During year under review**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **Not Applicable During year under review**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018
- (j) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993

and circulars/ guidelines issued thereunder;

and based on the above examination, I/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:-

| Sr.No. | Compliance Requirement (Regulations/circulars/ guidelines including specific clause) | Deviations | Observations/ Remarks of the Practicing Company Secretary |
|--------|--|--|--|
| 1. | Regulation 6(1) of SEBI (Listing Obligations and Disclosure Requirement) Regulations, 2015 | The Company during the Year ended March, 2019, has not appoint a qualified Company Secretary as the compliance officer of the company | Pursuant to the Regulation 6(1) of SEBI (Listing Obligations and Disclosure Requirement) Regulations, 2015, company was required to appoint a qualified Company Secretary as the compliance officer of the company, which was not appointed within due time. |
| 2. | Regulation 31 of SEBI (Listing Obligations and Disclosure Requirement) Regulations, 2015 | That hundred percent of shareholding of promoter(s) and promoter group should be in dematerialized form and the same should be maintained on a continuous basis in the manner as specified by the Board. | It is observed that 100% shareholding of the Company is in physical Mode. |

- (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 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. | NA | NA | NA | NA |

- (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) | Actions taken by the listed entity, if any | Comments of the Practicing Company Secretary on the actions taken by the listed entity |
|--------|--|--|--|--|
| 1. | NA | NIL | NA | NIL |

For Anand Nimesh & Associates

(Company Secretaries)


Anand Kumar Singh

(Partner)

M. No- 24881

COP No- 9404

Date: May 20, 2019

Place: Delhi

