



PUSHPSONS INDUSTRIES LTD.

CIN #: L74899DL1994PLC059950

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

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E-mail : pankaj@pushpsons.com
info@pushpsons.com

Date: - 15.07.2021

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, 2021

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, 2021. 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

For Pushpsons Industries Limited




Dinesh Jain
Managing Director
DIN: 00001912
Address: E-16, Lane W-4, Sainik Farms
New Delhi – 110062

Date: - 15-July, 2021

Place: New Delhi

Encl: As above

Anand Nimesh & Associates

(Company Secretaries)

183B, Gali No-8, Second Floor, Gurudwara Road
West Guru Angad Nagar, Laxmi Nagar, Delhi-110092
Tel: 011-45769228, M: 9868782243, 8810200014
E-mail: vdnext1711@gmail.com, ancorporate2@gmail.com
Website: www.anandnimesh.com

SECRETARIAL COMPLIANCE REPORT OF PUSHPSONS INDUSTRIES LIMITED FOR THE YEAR ENDED 31ST MARCH, 2021

To,
The Board of Directors
PUSHPSONS INDUSTRIES LIMITED
(CIN- L74899DL1994PLC059950)
B-40, Okhla Industrial Area, Phase 1, New Delhi - 110020

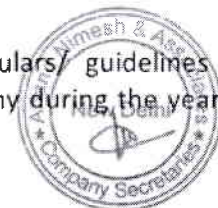
We, M/s Anand Nimesh & Associates, Practicing Company Secretaries have examined:

- (a) all the documents and records made available to us and explanation provided by Pushpsons Industrial Limited ("the Company"),
- (b) the filings/ submissions made by the Company to the stock exchange,
- (c) website of the Company, and
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31st March, 2021 ("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 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, as were relevant and applicable to the Company during the year under review, 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 to the Company during the Audit 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 to the Company during the Audit Period)**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not Applicable to the Company during the Audit Period)**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not Applicable to the Company during the Audit Period)**
- (g) 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 Audit Period)**
- (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, we hereby report that, during the Review Period:

- (a) The Company 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 31 of SEBI (Listing Obligations and Disclosure Requirement) Regulation, 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 entire shareholding of the company is in physical mode only. However as informed by the company it is under process to get share dematerialised.

- (b) The Company has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from our examination of those records so as to it was shown to us during our audit.
- (c) The following are the details of actions taken against the Company/ 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	BSE Limited	Discrepancies in Reconciliation of Share Capital Audit Report of the Company for the Quarter ended September, 2020	It is observed that the Listed Equity Capital reported in the XBRL Report is (4650100)(No. Of shares) not matching with the Listed Equity Capital as per Exchange records i.e. (On receiving of the captioned query/ Discrepancies, the Company had filed reply for the same.



			5890900)(No. Of shares) and Difference is 1240800 (No. Of shares).	
2	BSE Limited	Discrepancies in Reconciliation of Share Capital Audit Report of the Company for the Quarter ended December 2020.	It is observed that the Listed Equity Capital reported in the XBRL Report is (4650100)(No. Of shares) not matching with the Listed Equity Capital as per Exchange records i.e. (5890900)(No. Of shares) and Difference is 1240800 (No. Of shares).	On receiving of the captioned query/ Discrepancies, the Company had filed reply for the same.

(d) The Company 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 (31 st March, 2020)	Actions taken by the company, if any	Comments of the Practicing Company Secretary on the actions taken by the company
1.	The fines was imposed for late/non-compliance with certain provisions of SEBI (Listing Obligations	The fines/penalties was imposed for late/non-compliance with certain provisions of SEBI (Listing	As per documents/information produced by the company, said penalties was paid/waived off	As per documents/information produced by the company, said penalties was paid/waived off



	and Disclosure Requirements) Regulations, 2015	Obligations and Disclosure Requirements) Regulations, 2015		
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Note: Note: In view of the second wave of the COVID-19 pandemic and as per the guidance issued by the Institute of Company Secretaries of India (ICSI) for carrying out professional assignments, the Secretarial Compliance Report in term of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 was conducted by using appropriate Information Technology tools by virtual data sharing on e-mode to access and examine relevant documents for completion of the audit.

Further: During this challenging time of COVID 19 outbreak this report has been undertaken to the best of my capability based on of e verification of scans, soft copies, information, confirmations, records and documents made available to us by the management.

For Anand Nimesh & Associates
(Company Secretaries)

Anand K. Singh



ANAND KUMAR SINGH

(Partner)

M. No- F10812

COP No- 9404

UDIN- F010812C000366607

Date: 25/05/2021

Place: Delhi

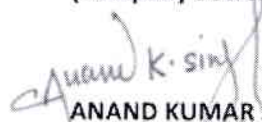
This Report is to be read with our letter of even date annexed herewith and forms an integral part of this Report.

To,
The Board of Directors
PUSHPSONS INDUSTRIES LIMITED

The Secretarial Compliance Report of even date is to be read along with this letter.

- 1) Maintenance of secretarial records under regulations, circulars and guidelines prescribed under the Securities and Exchange Board of India Act, 1992 (SEBI ACT) and the Securities Contracts (Regulation) Act, 1956 (SCRA) rules made thereunder and Regulations, circulars and guidelines issued thereunder by SEBI, is the responsibility of the management of the listed entity. Our responsibility is to express an opinion on these records based on our audit.
- 2) We have followed the audit practices and processes including procedures prescribed for and during COVID-19 period by The ICSI and as were appropriate to obtain reasonable assurance about the correctness of the contents of these records. The verification was done electronically to ensure that correct facts are reflected in the said records. We believe that the processes and practices we followed provide a reasonable basis for our opinion.
- 3) We have not verified the correctness and appropriateness of financial records and Books of Account of the listed entity.
- 4) Where ever required, we have obtained the Management representation about the compliance of laws, rules and regulations and happening of events etc.
- 5) The compliance of the provisions of SEBI ACT and SCRA, and regulations, circulars and guidelines prescribed thereunder, is the responsibility of management. Our examination was limited to the verification of documents and records made available to us and explanations provided to us with respect to the practices and processes followed in matters relating to this Report.
- 6) The Secretarial Compliance Report is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

For Anand Nimesh & Associates
(Company Secretaries)


ANAND KUMAR SINGH

(Partner)

M. No- F10812

COP No- 9404

UDIN- F010812C000366607

Date: 25/05/2021

Place: Delhi

