



ANUH PHARMA LTD.

Registered Office : 3-A, Shivsagar Estate, North Wing,
Dr. Annie Besant Road, Worli, **MUMBAI** - 400 018, **INDIA**.
Tel. : +91-22-6622 7575 • Fax : +91-22-6622 7600 / 7500
E-Mail : anuh@sk1932.com • CIN: L24230MH1960PLC011586

Date: 02nd December, 2024

To,
The Manager (Listing)
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort, Mumbai - 400 001

Ref: Scrip Code No. 506260

Subject: Disclosure pursuant to Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Dear Sir/Madam,

In continuation to our letter dated 30th August, 2024, we hereby inform that the Company, after due communication with BSE Limited, had filed the Representation through Listing Centre for Withdrawal of fines and penal action initiated by Stock Exchange.

Further, it is hereby stated that the Company is in compliance with the Regulation 18(1) of SEBI (LODR), 2015

Kindly take the above on your records.

Thanking you,

Yours faithfully,

FOR ANUH PHARMA LIMITED

MANAN VADHAN
COMPANY SECRETARY & COMPLIANCE OFFICER

Encl: a/a





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Dalal Street, Fort,
Mumbai - 400 001

Ref: Scrip Code No. 506260

Ref.: SOP-CReview/Jun 24-Q

Kind Attn: Mr. Sambhaji Solat Senior Manager, Mr. Rohan Kallan, Assistant Manager, Listing Compliance; Ms. Shraddha Bagwe, Deputy Manager, Listing Compliance and Ms. Reena Raphel Associate Manager, Listing Compliance.

Sub: Fines as per SEBI circular no. SEBI/HO/CFD/PoD2/CIR/P/2023/120 dated July 11, 2023 (Chapter-VII(A)-Penal Action for Non-Compliance).

Dear Sir/Madam,

We are in receipt of your email dated Wednesday, August 21, 2024 drawing our attention to the following Non-compliance:

Regulation 18(1)

Non-compliance with the constitution of Audit committee.

We wish to inform you that we are complied with the requirements of the relevant SEBI (LODR) Regulations, 2015, requirement on the issue pointed out by you, as could be observed from the explanations furnished below:

The Company filed the Corporate Governance report for the **Quarter ended June, 2024 on 19/07/2024**. The shall state that Company has complied with the provisions of SEBI (LODR), 2015, further, this is to inform that pursuant to the Regulation 18(1) of SEBI (LODR), 2015 the composition of Audit Committee is compiled having **2/3rd member as Independent Director** and the **Chairman being the Independent Director**.



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Factory : E-17/3, E-17/4 & E-18, M.I.D.C., Tarapur, BOISAR, Dist. Palghar - 401 506, INDIA. **Tel.:** +91-7410055574 / 75



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The **Composition of the Audit Committee** is as follows:

Sr. No.	Name of the Director	Designation	Date of Appointment
1	Mr. Harmanbhai T. Patel	Chairman, Non-Executive Independent Director	01-04-2024
2	Dr. (Ms.) Mita C. Dixit	Member, Non-Executive Independent Director	01-04-2024
3	Mr. Siddharth J. Shah	Member, Non-Executive Independent Director	01-04-2024
4	Mr. Pradeep H. Thakur	Member, Non-Executive Independent Director	01-04-2024
5	Mr. Arun L. Todarwal	Member, Non-Executive Non-Independent Director	28-10-2009
6	Mr. Bipin N. Shah	Member, Non-Executive Non-Independent Director	30-08-2006

Further, an email from Shraddha Bagwe, Deputy Manager-Listing Compliances at BSE, dated 29/07/2024 was received regarding Discrepancy which is as follows:

1. Discrepancy: 1. It is observed from the Corporate Governance Report filed for the quarter ended Jun 30, 2024, that as per Regulation 18(1)(b) of SEBI LODR Regulations, 2015, Anuh Pharma Ltd did not have 2/3rd of the members in the Audit Committee as Independent Director for the whole quarter.
2. It is observed from the Corporate Governance Report filed for the quarter ended Jun 30, 2024, that as per Regulation 19(1)(c) of SEBI LODR Regulations, 2015, for the whole quarter Anuh Pharma Ltd did not have 2/3rd of the members in the Nomination and Remuneration Committee as Independent Director. the same has been filed with the Corporate Governance Report for the Quarter ended June, 2024.

In reply to this discrepancy it was stated that it was only due to typographical error that occurred inadvertently that the Corporate Governance report initially filed had errors. Later the revised Corporate Governance report was filed on 30/07/2024.



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Further, mails from Shraddha Bagwe and Rohan Kallan dated 16/08/2024 was received regarding Discrepancy which is as follows:

- Mail from Shraddha Bagwe, Deputy Manager-Listing Compliances at BSE:

The date of appointment of Mr. Harmanbhai is incorrect.

Please provide the Board resolution passed for Change in designation of Mr. Arun.

- Mail from Mr. Rohan Kallan, Listing Compliances at BSE:

Further to the trailing mail, it is observed that there has been change in the constitution of the Audit and Nomination and Remuneration Committee, however, no cessation details have been provided. In this regard, you are advised to immediately file revised CG Report along with all the cessation details.

In response to the same the revised Corporate Governance Report for the Quarter ended June, 2024 along with the changes as recommended by BSE personnel's was filed with BSE on 18/08/2024. And the resolution as required by Shraddha Bagwe was sent on 20/08/2024.

On, 20/08/2024, the revised Corporate Governance Report was filed due to typographical error that occurred inadvertently and resolution as required by Ms. Shraddha Bagwe was sent.

Further, on the basis of the submissions made and the Corporate Governance Report filed with BSE the constitution of Audit committee is well within the compliance of Regulation 18(1) of SEBI (LODR), 2015.

In response to the mails sent and clarification provided, Mr. Rohan Kallan from BSE on 30/08/2024, mailed the Company that (enclosed herewith as Annexure - A):

We have taken note of your response. However, you are requested to make your representation for withdrawal of fines through Listing Centre.

Further, for assistance on how to file the application through Listing Centre, you may refer to the circular dated January 01, 2024 for withdrawal/waiver of SOP fines.



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Also, no further no actions would be initiated for the non-compliance observed under Regulation 18(1) for the quarter ended June 2024.

We wish to further inform you that the stand taken for invoking penal provisions under the referred SEBI Regulations and Circular is onerous and cripplingly punitive to the understanding and interpretation of the subject regulations by the Company especially so when the Company has diligently ensured compliance on all aspects of the Regulations as per the explanation submitted above and when there are no events adversely affecting stakeholder interest.

We request you to kindly consider our representation for withdrawal of fines and penal action initiated as per your above referred emails as proposed.

This disclosure shall also be filed through the portal www.listing.bseindia.com and by email to bse.soplodr@bseindia.com, reena.raphel@bseindia.com; Shraddha.Bagwe@bseindia.com; Rohan.Kallan@bseindia.com; and CGCOMPLIANCES@bseindia.com

Thanking You,

FOR ANUH PHARMA LIMITED


BIPIN NEMCHAND SHAH
VICE CHAIRMAN
(DIN: 00083244)



Encl: a/a



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Annexure - A

Anuhpharma CS

From: Rohan Kallan <Rohan.Kallan@bseindia.com>
Sent: Friday, August 30, 2024 12:11 PM
To: aplcs@sk1932.com
Cc: bse.soplodr; anuh@sk1932.com; CGCOMPLIANCES
Subject: RE: 506260-Fines as per SEBI circular no. SEBI/HO/CFD/PoD2/CIR/P/2023/120 dated July 11, 2023 (Chapter-VII(A)-Penal Action for Non-Compliance).

Sir,

We have taken note of your response. However, you are requested to make your representation for withdrawal of fines through Listing Centre.

Further, for assistance on how to file the application through Listing Centre, you may refer to the circular dated January 01, 2024 for withdrawal/waiver of SOP fines.

Also, no further no actions would be initiated for the non-compliance observed under Regulation 18(1) for the quarter ended June 2024.

Regards,
Rohan Kallan
Listing Compliance

BSE Limited,
MUMBAI
Phone (Direct) : 022-22725856
Mobile : 7977506337
www.bseindia.com

