



PAL/COMP/19  
May 30, 2019

Deptt of Corporate Service  
The Stock Exchange, Mumbai  
Phiroze Jeejeebhoy Towers  
Dalal Street  
**MUMBAI - 400 001**

**Ref: Security Code: 500456**

Sub : Submission of Annual Secretarial Compliance Report for the year ended  
31<sup>st</sup> March 2019.

Dear Sir,

Please find Annual Secretarial Compliance Report Under Regulation 24A of  
SEBI (Listing Obligation and Disclosure Requirement) Regulations 2015 for the  
year ended 31<sup>st</sup> March 2019.

Thanking you,

Yours faithfully,  
For **PASUPATI ACRYLON LIMITED**

**Satish Kumar Bansal**  
**Chief Financial Officer**

Encl: As above.

**P A S U P A T I A C R Y L O N . L T D .**

**SECRETARIAL COMPLIANCE REPORT  
OF  
PASUPATI ACRYLON LIMITED FOR THE YEAR ENDED 31<sup>st</sup> MARCH 2019**

We, V. K. Sharma & Co. Company Secretaries have examined:

- (a) all the documents and records made available to us and explanation provided by **Pasupati Acrylon 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 **31<sup>st</sup> March 2019 ("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 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");

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;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (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;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- (g) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013;
- (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;

and circulars/ guidelines issued there under;

and based on the above examination, 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 there under, 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	Reg 34(1) of LODR	Annual Report not filed within 21 working days of AGM	At the time of online filing of the Report on 10.10.2018 on the BSE Listing Center an inadvertent error of choosing file occurred and file containing only covering letter was filed.

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under insofar as it appears from 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 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 any.
1	Bombay Stock Exchange	Non filing of Annual Report within 21 days of AGM	Letter dated 31 <sup>st</sup> January 2019 received from BSE imposing penalty.	The Annual Report was filed on 05.02.2019 on receipt of letter dated 31.01.2019 from BSE. The waiver of penalty from BSE is awaited.

- (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... <i>(The years are to be mentioned)</i>	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
Not applicable being the first year of reporting.				

Place: Noida  
Date: 24<sup>th</sup> May 2019

For V. K. Sharma & Co.  
Company Secretaries

Digitally signed by  
VIJAY KUMAR SHARMA  
Date: 2019.05.24  
16:08:34 +05'30'

(V. K. Sharma)  
FCSNo.: 3440  
C P No.: 2019