

**Date:** 13<sup>th</sup> June, 2021

To,  
BSE Limited  
Phiroze Jeejeebhoy Tower,  
Dalal Street,  
Mumbai – 400 001

Dear Sir / Ma'am,

**Subject: Annual Secretarial Compliance Report under Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 for the year ended on 31<sup>st</sup> March, 2021**

**Ref: Security Id: EARUM / Code: 542724**

With reference to the captioned subject, kindly find attached herewith Annual Secretarial Compliance Report issued under Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015 for the year ended on 31<sup>st</sup> March, 2021.

Kindly take the same on your record and oblige us.

Thanking You

For, Earum Pharmaceuticals Limited

**Bhumishth Patel**  
**Managing Director**  
**DIN: 02516641**

**SECRETARIAL COMPLIANCE REPORT OF EARUM PHARMACEUTICALS LIMITED  
FOR THE YEAR ENDED MARCH 31, 2022**

We, Gaurav Bachani & Associates, Company Secretaries, Ahmedabad have examined:

- (a) all the documents and records made available to us and explanation provided by **Earum Pharmaceuticals 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 **March 31, 2022** ("Review Period") in respect of compliance with the provisions of: -

- (i) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- (ii) 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;

During the period of our audit the listed entity has not done any buy back of its securities. Hence the reporting of compliance under these regulations does not arise.

- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;

During the period of our audit the listed entity has not issued/granted any Share Based Employee Benefits to their employees. Hence the reporting of compliance under these regulations does not arise.



- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;

During the period of our audit the listed entity has not issued/listed any Debt Security. Hence the reporting of compliance under these regulations does not arise.

- (g) Securities and Exchange Board of India (Issue and Listing of Non-convertible and Redeemable Preference Shares) Regulations, 2013;

During the period of our audit the listed entity has not issued/listed any Non-convertible and Redeemable Preference Shares. Hence the reporting of compliance under these regulations does not arise.

- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

- (i) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993;

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 thereunder, *Except*

*Company has violated Regulation 6(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015 which says that Company should notify the particulars to Stock Exchange within two trading working days of receipt of the Disclosure. However Company has delayed in informing to Stock Exchange.*

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far 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.
NIL				





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- (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
NIL				

FOR, GAURAV BACHANI & ASSOCIATES,  
COMPANY SECRETARIES

*G V Bachani*

GAURAV V. BACHANI  
PROPREITOR  
ACS No.: 61110  
COP No.: 22830  
FRN: S2020GJ718800  
UDIN: A061110D000457539



Date: 03/06/2022  
Place: Ahmedabad