



May 11, 2022

<b>To,</b> <b>BSE Limited</b> <b>Listing Department</b> 25 <sup>th</sup> Floor, P J Towers, Dalal Street Mumbai -400001  Stock Code. <b>500456</b>	<b>To,</b> <b>Manager – Listing Compliances</b> <b>National Stock Exchange Of India Ltd.</b> Exchange Plaza Bandra Kurla Complex Bandra (E), Mumbai-400051  Stock Code: <b>PASUPTAC</b>
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Dear Sir/Madam

**Sub : Annual Secretarial Compliance Report for the Year Ended 31<sup>st</sup> March, 2022**

**Ref : Regulations 24A of of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015**

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015 read with SEBI circular no. CIR/CFD/CMD1/27/2019 dated February 08, 2019, please find enclosed herewith Annual Secretarial Compliance Report as issued by V.K. Sharma & Co., Company Secretaries for the financial year ended March 31, 2022.

We request you to please take the above on record.

Thanking you,

Yours faithfully,

**For Pasupati Acrylon Limited**

**Bharat Kapoor**  
**Company Secretary & Compliance Officer**

Encl: as above

# PASUPATI ACRYLON LTD.

**V.K SHARMA & CO.**

Company Secretaries  
B-1902, Ace Aspire, Techzone 4  
Greater Noida (West)-201306  
Mobile: 9811009592, 9818816592  
E-Mail: vks\_cosecy@yahoo.com

**SECRETARIAL COMPLIANCE REPORT  
OF  
PASUPATI ACRYLON LIMITED FOR THE YEAR ENDED 31<sup>st</sup> MARCH 2022**

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 2022 ("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; **NOT APPLICABLE.**
- (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**



- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 (since repealed) and SEBI (Share Based Employee Benefits & Sweat Equity) Regulations, **2021: NOT APPLICABLE**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (since repealed) and SEBI (Issue and Listing of Non-convertible Securities), 2021: **NOT APPLICABLE**
- (g) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013 (since repealed); **NOT APPLICABLE**
- (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:
- (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:

**V.K SHARMA & CO.**  
Company Secretaries

Sr. No.	Action taken by	Details of violation	Details of action taken E.g. fines, warning letter, debarment, etc.	Observation s/ remarks of the Practicing Company Secretary , if any.
	N/A	N/A	N/A	See note below

**Note:** A typo error in date of appointment of CS in Reconciliation of Share Capital Audit Report (CAPRECON) submitted for the quarter 31.03.2021 had resulted in BSE imposing a fine for non-appointment of CS in the quarter ending 31.03.2021. The company had represented that there was no violation as the date of appointment of CS was 15.01.2020 but due to a typo error the date mentioned was 15.01. 2021. Subsequently the Company had filed revised CAPRECON with BSE. The fine was waived off by BSE.

(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 2021	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
	NIL	NIL	N/A	N/A

Place: Greater Noida  
Date: May 11, 2022

For V K Sharma & Co.  
Company Secretaries

VIJAY KUMAR SHARMA  
Digitally signed by VIJAY KUMAR SHARMA  
Date: 2022.05.11 13:35:22 +05'30'

(V. K. SHARMA)

FCS: 3440

C.P. No. 2019

PR: 887/2020

UDIN: F003440D000301958