

TIRTH PLASTIC LIMITED

CIN: L25209GJ1986PLC009021

Date 31/07/2020

To, BSE LIMITED P J Towers, Dalal Street, Fort, Mumbai-400001

Dear Sir/ Madam

Sub: Submission of Annual Secretarial Compliance Report of the Company for the financial year ended March 31, 2020 (BSE SCRIP CODE: 526675)

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular (CIR/CFD/CMD1 /27/ 2019) dated February 8, 2019 and other applicable provisions, if any, please find enclosed herewith Annual Secretarial Compliance Report of the Company for the financial year ended on March 31, 20, issued by a M/s.A. Shah & Associates, Practicing Company Secretaries.

You are requested to kindly take note of the same.

Thanking You

Yours faithfully

FOR, TIRTH PLASTIC LIMITED

MR. VARIS DOSHI MANAGING DIRECTOR

(DIN:02963528)

Regd. Off. A/304, Infinity Tower, Nr. Ramada Hotel Corporate Road, Prahaladnagar, Ahmedabad-380015.

E-mail: tirthplastic@gmail.com • Website: www.tirthlimited.in • Phone: 079-40397787

A.SHAH &ASSOCIATES PRACTICING COMPANY SECRETARIES

CS ANISH B. SHAH

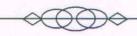






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SECRETARIAL COMPLIANCE REPORT OF M/S. TIRTH PLASTIC LIMITED FOR THE YEAR ENDED 31ST MARCH, 2020

We M/s. A. Shah & Associates, Practicing Company Secretaries have examined:

- (a) all the documents and records made available to us and explanation provided by M/S. TIRTH PLASTIC 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 31st March, 2020 ("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 (Depository Participant) Regulations, 2018 and circulars/guidelines issued thereunder;

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 in respect of matters specified below:-

Sr.	Compliance	Deviations	Observations/ Remarks of the
No.	Requirement		Practicing Company Secretary
	(Regulations/ circulars/ guidelines		
	including specific		
	clause)		OV.
1	Reg - 14 of SEBI(LODR)	Payment of Annual	The Company has not paid Annual Listing
	Regulations, 2015	Listing Fees	Fees to the stock Exchange with in
			prescribed time.
2	Reg - 29 of SEBI(LODR)	Intimation of Board	The Company had not provided prior
	Regulations, 2015	Meeting for financial	intimation of Board meeting to BSE to
		results for	consider the quarterly financial results
		September- 2019.	for the quarter September- 2019.
3	Reg - 31(2) of	100% (Hundred	There is only three shareholders from
	SEBI(LODR) Regulations,	percent) shareholding	promoter group are holding shares in
	2015	of promoter and	Demat. All the other promoter
		promoter group is not	shareholders are still holding shares in
		held in	physical.
		Dematerialized Form.	Y.
6	Reg - 34 of SEBI(LODR)	Delay in submission	The Company has made delay in
	Regulations, 2015	of Annual Report to	submission of Annual Report to BSE for
ů.		BSE	the financial year 2018-19. However,
			Annual Report in XBRL has been
			uploaded by the company within
_	D 26 -CEDIGODD	D: 1 C A 1	prescribed time.
5	Reg - 36 of SEBI(LODR)	Dispatch of Annual	The Company is yet to provide proof of
	Regulations, 2015	Report to shareholders	dispatch of Annual Report to the Shareholders for the Financial Year 2018-
		Shareholders	19.
6	Reg - 44 of SEBI(LODR)	Not provided E voting	The company has not provided e voting
	Regulations, 2015	facilities to	facility to its shareholders of the

		shareholders	company.
7	Reg - 47 of SEBI(LODR)	Publication of	The Company had not complied with the
	Regulations, 2015	Advertisement in	requirement of Regulation 47 of SEBI
		Newspaper for	(LODR) Regulations, 2015 with respect to
		intimation of Board	publication of newspaper advertisement
		meeting, financial	with respect to intimation of Board
		Results, Notice of	meeting, publication of quarterly financial
		AGM, Book Closure	Results, Notice of AGM, Book Closure and
		and Evoting	Evoting.

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from my/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 thereunder:

Sr. No	Action taken by	Details of violation		Observations/ remarks of the Practicing Company Secretary, if any.
1	BSE	Non Compliance with various Regulations of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	Suspension of trading in securities of	The company had been suspended for trading in equity shares by BSE w.e.f. 18th February, 2002 due to non-compliances of certain Regulation of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015. However, the Company had applied for Revocation of Suspension of Trading in equity shares of Company. The Company had already complied with various pending Regulations of SEBI(LODR) Regulations, 2015 and the company is currently complying with the various quarterly and half yearly regulations on regular basis.

(d) The listed entity has taken the following actions to comply with the observations made in previous reports:

	promo	P										
Sr.	Observa	tions	of	Observations	made	in	Acti	ions	taken	Comments	of	the
No	the	Practio	cing	the	secreta	rial	by	the	listed	Practicing	Com	pany
	Company	y		compliance	report	for	enti	ity, if	any	Secretary	on	the

Secretary in the previous reports	the year ended on 31.03.2019		actions taken by the listed entity
1 Reg- 6(2) of SEBI(LODR) Regulations, 2015 Not appointed Company Secretary as a Compliance Officer	The Company has not complied with the regulation 6(2) of SEBI(LODR) Regulations, 2015 with respect to appointment of Company Secretary as a compliance officer of the Company for the financial year 2018-19.	The Company has appointed Company Secretary as a compliance officer of the Company during the financial year 2019-20	The Company has complied with the requirement of Reg-6(2) of SEBI(LODR) Regulations, 2015 during the financial year 2019-20.
Delay in submission of Reg- 13(3), 31, 27(2), 33, 7(3), 40(9) of SEBI(LODR) Regulations, 2015 and Regulation 55A of SEBI (Depository Participant) Regulations, 1996 for June, 2018 and September, 2018	The company had submitted Reg- 13(3), 31, 27(2), 33, 7(3), 40(9) of SEBI(LODR) Regulations, 2015 and Regulation 55A of SEBI (Depository Participant) Regulations, 1996 for the quarter ended on June, 2018 and quarter and half year ended on September, 2018 to BSE on 4th January, 2019 along with application of Revocation of suspension of trading in equity shares of the Company. The Company further clarified that the company had been delisted from BSE w.e.f. 04th July, 2018 due to non compliance of various regulations. However, Company had received stay order from Securities Appellate Tribunal (SAT) against such delisting and currently the company is under the phase of Suspension of trading in	The Company has taken corrective steps and complied with all the regulations in timely manner during the financial year 2019-20	The Company has complied with the said regulations during the financial year 2019-20 with in prescribed time.

		securities.		
3	Reg -14 of SEBI(LODR) Regulations , 2015	The Company has not paid Annual Listing Fees to the stock Exchange	The Company has paid annual listing fees for	The Company is yet to provide supporting o payment of Annua
	Payment of Annual Listing Fees	with in prescribed time.	previous financial year 2018-19.	Listing fees.
1	Reg-29 of SEBI(LODR) Regulations, 2015 Intimation of Board	The Company had not provided prior intimation of Board meeting to BSE	The Company has provided intimation of	The Company has complied with the said regulation during
	Meeting for financial results for June-2018, September-	to consider the quarterly financial results for the quarter ended on June- 2018, September- 2018	board meeting to BSE except for the quarter ended on	the financial year 2019-20.
	2018 and December- 2018	and December- 2018.	September - 2019	
5	Reg- 31 of SEBI(LODR) Regulations, 2015 Delay in submission	The company had submitted Regulation – 31 Shareholding Pattern to BSE after the due date of	The company has taken corrective steps and not made	The Company has complied with Reg 33 during the financial year 2019-20.
	of Regulation- 31 Shareholding Pattern on BSE for the quarter ended	the submission of the same due to delay in receipt of data from RTA. The Company had	any delay in submission of shareholding	
	on March, 2019	The Company had complied with the said regulation on later date as and when it had received the data from RTA.	pattern during the financial year 2019-20.	
5	Reg - 31(2) of SEBI(LODR) Regulations, 2015 100% (Hundred	There is only three shareholders from promoter group are holding shares in Demat.	The Company has informed the shareholders to dematerialize	The Company is yet to comply with the requirement of the said regulation.
e:	percent) shareholding of promoter and	All the other promoter shareholders are still holding shares in physical.	their share. However, concrete step	
	promoter group is not held in Dematerialized Form.		has not been taken by the shareholders.	
7	Reg- 33 of SEBI(LODR)Regulati ons, 2015 Delay in	The Company had not submitted financial results for the quarter	The company has taken corrective steps	The Company has complied with Reg 33 during the financia

	submission of Financial results for the quarter ended on December, 2018 and March, 2019	and March, 2019 with in prescribed time due to delay in preparation of Financial results for unavoidable circumstances. However, the company had submitted the same to BSE on a later date.	any delay in submission of financial results during the financial year 2019-20.	
8	Reg- 33(d) of SEBI(LODR) Regulations, 2015 The Auditor of the Company is not peer reviewed	the statutory auditor of the Company who is issuing Limited Review		The Company has complied with the said regulation during the financial year 2019-20.
9	Reg- 36 of SEBI(LODR) Regulations, 2015 Dispatch of Annual Report to shareholders	The Company is yet to provide proof of dispatch of Annual Report to the Shareholders for the Financial Year 2017-18.	has not provided supporting for	The Company is yet to comply with the said regulation
10	Reg- 44 of SEBI(LODR) Regulations, 2015 E voting facilities to shareholders and voting Results	The company has not provided e voting facility to its shareholders of the company. The company had also not submitted voting results of AGM to BSE. However, the Company has executed e voting agreement.	The Company has taken effective steps and also generated EVSN for evoting. However, due to delay in uploading data on site the EVSN could not be activated. The Company has submitted voting results to BSE for the AGM held for 2018-19.	The Company is yet to comply with the provision of providing Evoting facility to shareholders.
11	Reg- 46 of SEBI(LODR)		The Company has	The Company has Complied with

	Regulations, 2015 Non updation of Website of the Company	Company has not maintained and updated by the Company as per the requirement of Regulation - 46 of	the website of the Company as per the requirement of Regulation- 46 of	Regulation- 46 of SEBI (LODR) Regulations, 2015 in the Financial year 2019-20.
		SEBI(LODR) Regulations, 2015.	SEBI (LODR) Regulations, 2015.	
12	Reg- 47 of SEBI(LODR) Regulations, 2015 Publication of Advertisement in Newspaper for intimation of Board meeting, financial Results, Notice of AGM, Book Closure and E voting.	The Company had not complied with the requirement of Regulation 47 of SEBI(LODR) Regulations, 2015 with respect to publication of newspaper advertisement with respect to intimation of Board meeting, publication of quarterly financial Results, Notice of AGM, Book Closure and Evoting.	not taken any effective steps for the mentioned	regulation - 47 of SEBI(LODR) Regulations,
13	Share Capital Audit Report on BSE for	The company had submitted Regulation – 55A Reconciliation of Share Capital Audit Report to BSE after the due date of the submission of the same due to delay in receipt of data from RTA. The Company had complied	has taken effective steps and submitted Reg 55A with in prescribed time during the	
14	SEBI Circular for Strengthening the Guidelines and Raising Industry standards for RTA, Issuer Companies and Banker to an Issue	The Company had not send reminder to shareholders for collecting their PAN details and bank details.	The Company has not taken any steps for the said compliance.	The Company is yet to comply with said requirement.

(SEBI/HO/N	AIDCD /D		
	5		
OP1/CIR/P	/2018/7		
3) Remin	der to		
shareholder	s for	1	
providing the	neir PAN		
no. and Ban	k details		
to Comp	any if		
already	not		
registered	with		4
Company.			

(e) The Company has complied with the provision of Para 6(A) and 6(B) of SEBI Circular No. CIR/CFD/CMD1/114/2019 dated 18th October, 2019 and the terms of appointment of the statutory auditor of the Company have been suitably modified to give effect to aforesaid circular.

PLACE: AHMEDABAD DATE: 28/07/2020

FOR, M/S. A.SHAH & ASSOCIATES PRACTICING COMPANY SECRETARIES

Anish Digitally signed by Anish Babubhai Shah Date: 2020.07.28 19:06:05

MR. ANISH B. SHAH FCS NO.: 4713 C P NO.:6560 (UDIN: F004713B000518160)

A.SHAH &ASSOCIATES PRACTICING COMPANY SECRETARIES

CS ANISH B. SHAH



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SECRETARIAL COMPLIANCE REPORT OF M/S. TIRTH PLASTIC LIMITED FOR THE YEAR ENDED 31ST MARCH, 2020

We M/s. A. Shah & Associates, Practicing Company Secretaries have examined:

- (a) all the documents and records made available to us and explanation provided by **M/S**. **TIRTH PLASTIC 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 $31^{\rm st}$ March, 2020 ("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:-

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- (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 (Depository Participant) Regulations, 2018 and circulars/guidelines issued thereunder;

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 in respect of matters specified below:-

Sr.	Compliance	Deviations	Observations/ Remarks of the
No.	Requirement		Practicing Company Secretary
	(Regulations/		
	circulars/ guidelines		
	including specific		
	clause)		
1	Reg - 14 of SEBI(LODR)	Payment of Annual	The Company has not paid Annual Listing
	Regulations, 2015	Listing Fees	Fees to the stock Exchange with in
			prescribed time.
2	Reg - 29 of SEBI(LODR)	Intimation of Board	The Company had not provided prior
	Regulations, 2015	Meeting for financial	intimation of Board meeting to BSE to
		results for	consider the quarterly financial results
		September- 2019.	for the quarter September- 2019.
3	Reg - 31(2) of	100% (Hundred	There is only three shareholders from
	SEBI(LODR) Regulations,	percent) shareholding	promoter group are holding shares in
	2015	of promoter and	Demat. All the other promoter
		promoter group is not	shareholders are still holding shares in
		held in	physical.
		Dematerialized Form.	
6	Reg - 34 of SEBI(LODR)	Delay in submission	The Company has made delay in
	Regulations, 2015	of Annual Report to	submission of Annual Report to BSE for
		BSE	the financial year 2018-19. However,
			Annual Report in XBRL has been
			uploaded by the company within
			prescribed time.
5	Reg - 36 of SEBI(LODR)	Dispatch of Annual	The Company is yet to provide proof of
	Regulations, 2015	Report to	dispatch of Annual Report to the
		shareholders	Shareholders for the Financial Year 2018-
			19.
6	Reg - 44 of SEBI(LODR)	Not provided E voting	The company has not provided e voting
	Regulations, 2015	facilities to	facility to its shareholders of the

		shareholders	company.
7	Reg - 47 of SEBI(LODR)	Publication of	The Company had not complied with the
	Regulations, 2015	Advertisement in	requirement of Regulation 47 of SEBI
		Newspaper for	(LODR) Regulations, 2015 with respect to
		intimation of Board	publication of newspaper advertisement
		meeting, financial	with respect to intimation of Board
		Results, Notice of	meeting, publication of quarterly financial
		AGM, Book Closure	Results, Notice of AGM, Book Closure and
		and Evoting	Evoting.

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from my/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 thereunder:

	T			
Sr.	Action	Details of	Details of action	Observations/ remarks of the Practicing
No	taken	violation	taken E.g. fines,	Company Secretary, if any.
	by		warning letter,	
			debarment, etc.	
1	BSE	Non	Suspension of	The company had been suspended for trading
		Compliance	trading in	in equity shares by BSE w.e.f. 18 th February,
		with various	securities of	2002 due to non-compliances of certain
		Regulations of	companies for	Regulation of SEBI (Listing Obligations and
		SEBI (Listing	non-compliances	Disclosure Requirements) Regulations, 2015.
		Obligations	of certain	However, the Company had applied for
		and	Regulation of SEBI	Revocation of Suspension of Trading in equity
		Disclosure	(Listing	shares of Company. The Company had already
		Requirements	Obligations and	complied with various pending Regulations of
) Regulations,	Disclosure	SEBI(LODR) Regulations, 2015 and the
		2015	Requirements)	company is currently complying with the
			Regulations, 2015	various quarterly and half yearly regulations
				on regular basis.

(d) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr.	Observat	tions of	Observations	made	in	Acti	ions	taken	Comments	of	the
No	the	Practicing	the	secreta	rial	by	the	listed	Practicing	Comp	pany
	Company	y	compliance	report	for	enti	ity, if a	any	Secretary	on	the

	Secretary in the previous reports	the year ended on 31.03.2019		actions taken by the listed entity
1	Reg- 6(2) of SEBI(LODR) Regulations, 2015 Not appointed Company Secretary as a Compliance Officer	The Company has not complied with the regulation 6(2) of SEBI(LODR) Regulations, 2015 with respect to appointment of Company Secretary as a compliance officer of the Company for the financial year 2018-19.	Company during	The Company has complied with the requirement of Reg-6(2) of SEBI(LODR) Regulations, 2015 during the financial year 2019-20.
2	Delay in submission of Reg- 13(3), 31, 27(2), 33, 7(3), 40(9) of SEBI(LODR) Regulations, 2015 and Regulation 55A of SEBI (Depository Participant) Regulations, 1996 for June, 2018 and September, 2018	The company had submitted Reg- 13(3), 31, 27(2), 33, 7(3), 40(9) of SEBI(LODR) Regulations, 2015 and Regulation 55A of SEBI (Depository Participant) Regulations, 1996 for the quarter ended on June, 2018 and quarter and half year ended on September, 2018 to BSE on 4th January, 2019 along with application of Revocation of suspension of trading in equity shares of the Company. The Company further clarified that the company had been delisted from BSE w.e.f. 04th July, 2018 due to non compliance of various regulations. However, Company had received stay order from Securities Appellate Tribunal (SAT) against such delisting and currently the company is under the phase of Suspension of trading in	and complied with all the regulations in timely manner during the	

		securities.		
3	Reg -14 of SEBI(LODR) Regulations , 2015 Payment of Annual Listing Fees	The Company has not paid Annual Listing Fees to the stock Exchange with in prescribed time.	The Company has paid annual listing fees for previous financial year 2018-19.	The Company is yet to provide supporting of payment of Annual Listing fees.
4	Reg-29 of SEBI(LODR) Regulations, 2015 Intimation of Board Meeting for financial results for June-2018, September-2018 and December-2018	The Company had not provided prior intimation of Board meeting to BSE to consider the quarterly financial results for the quarter ended on June-2018, September- 2018 and December- 2018.	The Company has provided intimation of board meeting to BSE except for the quarter ended on September - 2019	
5	Reg- 31 of SEBI(LODR) Regulations, 2015 Delay in submission of Regulation- 31 Shareholding Pattern on BSE for the quarter ended on March, 2019	The company had submitted Regulation – 31 Shareholding Pattern to BSE after the due date of the submission of the same due to delay in receipt of data from RTA. The Company had complied with the said regulation on later date as and when it had received the data from RTA.	and not made any delay in	The Company has complied with Reg 31 during the financial year 2019-20.
6	Reg - 31(2) of SEBI(LODR) Regulations, 2015 100% (Hundred percent) shareholding of promoter and promoter group is not held in Dematerialized Form.	There is only three shareholders from promoter group are holding shares in Demat. All the other promoter shareholders are still holding shares in physical.	The Company has informed the shareholders to dematerialize their share. However, concrete step has not been taken by the shareholders.	The Company is yet to comply with the requirement of the said regulation.
7	Reg- 33 of SEBI(LODR)Regulati ons, 2015 Delay in	The Company had not submitted financial results for the quarter	The company has taken corrective steps	The Company has complied with Reg 33 during the financial

	submission of	ended on December, 2018	and not made	year 2019-20.
	Financial results for	·		year 2019-20.
		and March, 2019 with in	3	
	the quarter ended	prescribed time due to	submission of	
	on December, 2018	delay in preparation of	financial results	
	and March, 2019	Financial results for	during the	
		unavoidable	financial year	
		circumstances. However,	2019-20.	
		the company had		
		submitted the same to		4
		BSE on a later date.		
8	Reg- 33(d) of	It has been observed that	The company	The Company has
	SEBI(LODR)	the statutory auditor of	has appointed	complied with the
	Regulations, 2015	the Company who is	new auditor	said regulation during
	The Auditor of the	issuing Limited Review	having peer	the financial year
	Company is not peer	Report and Audit Report	review	2019-20.
	reviewed	on a quarterly and yearly	certificate.	2 017 201
	Tevieweu	basis is not peer reviewed	cer cinicate.	
		by ICAI.		
9	Reg- 36 of		The company	The Company is yet to
9	O	The Company is yet to	The company	The Company is yet to
	SEBI(LODR)	provide proof of dispatch	has not provided	comply with the said
	Regulations, 2015	of Annual Report to the	supporting for	regulation
	Dispatch of Annual	Shareholders for the	the dispatch of	
	Report to	Financial Year 2017-18.	Annual Report	
	shareholders		_	_
10	Reg- 44 of	The company has not	• •	The Company is yet to
	SEBI(LODR)	provided e voting facility	has taken	comply with the
	Regulations, 2015 E	to its shareholders of the	effective steps	provision of providing
	voting facilities to	company. The company	and also	Evoting facility to
	shareholders and	had also not submitted	generated EVSN	shareholders.
	voting Results	voting results of AGM to	for evoting.	
		BSE. However, the	However, due to	
		Company has executed e	delay in	
	Y	voting agreement.	uploading data	
			on site the EVSN	
			could not be	
			activated. The	
			Company has	
			submitted voting	
			results to BSE	
			for the AGM held	
11	D	Te bas has a sleep 1 st.	for 2018-19.	The Company has
11	Reg- 46 of	It has been observed that	The Company has taken necessary	• •
	SEBI(LODR)	the website of the	taken necessary	Complied with

	Regulations, 2015	Company has not	action and undated	Regulation- 46 of SEBI
	Non updation of	maintained and updated		(LODR) Regulations,
	Website of the	by the Company as per		2015 in the Financial
			the requirement of	
	Company	1	Regulation- 46 of	_
		Regulation - 46 of	SEBI (LODR)	
		SEBI(LODR) Regulations,	Regulations, 2015.	
1.0		2015.		
12	Reg- 47 of	1 5		The company is yet to
	SEBI(LODR)	complied with the	not taken any	
	Regulations, 2015	requirement of	effective steps for	_
	Publication of	Regulation 47 of SEBI(regulation - 47 of
	Advertisement in	LODR) Regulations, 2015	current financial	SEBI(LODR) Regulations,
	Newspaper for	with respect to	year.	2013
	intimation of Board	publication of newspaper	year.	
	meeting, financial	advertisement with		
	Results, Notice of	respect to intimation of		
	AGM, Book Closure	Board meeting,		
	and E voting.	publication of quarterly		
		financial Results, Notice of		
		AGM, Book Closure and		
		Evoting.		
13	Regulation 55A of		The company	The Company has
	SEBI (Depository	submitted Regulation -	has taken	complied with the
	Participant)	55A Reconciliation of		said regulation for the
	Regulations, 1996	Share Capital Audit	_	financial year 2019-
	Delay in submission	Report to BSE after the	Reg 55A with in	20.
	of Regulation 55A	due date of the	o .	
	Reconciliation of		during the	
	Share Capital Audit		U	
	Report on BSE for	data from RTA. The	2019-20.	
	the quarter ended	Company had complied	2017 20.	
	on December- 2018	with the said regulation		
	and March, 2019	on later date as and when		
	and March, 2019			
		it had received the data		
1.4	CEDI Cimeralan Cara	from RTA.	The Comment	The Commons is seek to
14	SEBI Circular for	The Company had not		The Company is yet to
	Strengthening the	send reminder to	has not taken	comply with said
	Guidelines and	shareholders for	any steps for the	requirement.
	Raising Industry	collecting their PAN	said compliance.	
	standards for RTA,	details and bank details.		
	Issuer Companies			
	_			
	and Banker to an			

(SEBI/HO/MIRSD/D		
OP1/CIR/P/2018/7		
3) Reminder to		
shareholders for		
providing their PAN		
no. and Bank details		
to Company if		
already not		
registered with		4
Company.		

(e) The Company has complied with the provision of Para 6(A) and 6(B) of SEBI Circular No. CIR/CFD/CMD1/114/2019 dated 18^{th} October, 2019 and the terms of appointment of the statutory auditor of the Company have been suitably modified to give effect to aforesaid circular.

PLACE: AHMEDABAD DATE: 28/07/2020

FOR, M/S. A.SHAH & ASSOCIATES PRACTICING COMPANY SECRETARIES

Anish Babubhai Shah Date: 2020/07.28 19:06:05

MR. ANISH B. SHAH

FCS NO.: 4713 C P NO.:6560

(UDIN: F004713B000518160)