



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)

A.SHAH & ASSOCIATES
PRACTICING COMPANY SECRETARIES

CS ANISH B. SHAH

 IB.COM



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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;

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(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. No.	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1	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.
2	Reg - 29 of SEBI(LODR) Regulations, 2015	Intimation of Board Meeting for financial results for September- 2019.	The Company had not provided prior intimation of Board meeting to BSE to consider the quarterly financial results for the quarter September- 2019.
3	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.
6	Reg - 34 of SEBI(LODR) Regulations, 2015	Delay in submission of Annual Report to BSE	The Company has made delay in submission of Annual Report to BSE for 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) 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 2018-19.
6	Reg - 44 of SEBI(LODR) Regulations, 2015	Not provided E voting facilities to	The company has not provided e voting facility to its shareholders of the

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		shareholders	company.
7	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 Evoting	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.

(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	Details of action taken E.g. fines, warning letter, debarment, etc.	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 companies for non-compliances of certain Regulation of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	The company had been suspended for trading in equity shares by BSE w.e.f. 18 th 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:

Sr. No.	Observations of the Practicing Company	Observations made in the secretarial compliance report for	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the
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	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.
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 4 th 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. 04 th 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.

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		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	The Company has complied with the said regulation during the financial year 2019-20.
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.	The company has taken corrective steps and not made any delay in submission of shareholding pattern during the financial year 2019-20.	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)Regulations, 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

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	submission of Financial results for the quarter ended on December, 2018 and March, 2019	ended on December, 2018 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.	and not made any delay in submission of financial results during the financial year 2019-20.	year 2019-20.
8	Reg- 33(d) of SEBI(LODR) Regulations, 2015 The Auditor of the Company is not peer reviewed	It has been observed that the statutory auditor of the Company who is issuing Limited Review Report and Audit Report on a quarterly and yearly basis is not peer reviewed by ICAI.	The company has appointed new auditor having peer review certificate.	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.	The company has not provided supporting for the dispatch of Annual Report	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)	It has been observed that the website of the	The Company has taken necessary	The Company has Complied with

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	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 SEBI(LODR) Regulations, 2015.	action and updated the website of the Company as per the requirement of Regulation- 46 of SEBI (LODR) Regulations, 2015.	Regulation- 46 of SEBI (LODR) Regulations, 2015 in the Financial year 2019-20.
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.	The company has not taken any effective steps for the mentioned violation in the current financial year.	The company is yet to comply with the requirement of regulation - 47 of SEBI(LODR) Regulations, 2015
13	Regulation 55A of SEBI (Depository Participant) Regulations, 1996 Delay in submission of Regulation 55A Reconciliation of Share Capital Audit Report on BSE for the quarter ended on December- 2018 and March, 2019	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 with the said regulation on later date as and when it had received the data from RTA.	The company has taken effective steps and submitted Reg 55A with in prescribed time during the financial year 2019-20.	The Company has complied with the said regulation for the financial year 2019- 20.
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.

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(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 Company.			
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(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
Babubhai Shah

Digitally signed by Anish
Babubhai Shah
Date: 2020.07.28 19:06:05
+05'30'

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



**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;

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(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. No.	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
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3	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.
6	Reg - 34 of SEBI(LODR) Regulations, 2015	Delay in submission of Annual Report to BSE	The Company has made delay in submission of Annual Report to BSE for 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) 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 2018-19.
6	Reg - 44 of SEBI(LODR) Regulations, 2015	Not provided E voting facilities to	The company has not provided e voting facility to its shareholders of the

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		shareholders	company.
7	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 Evoting	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.

(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	Details of action taken E.g. fines, warning letter, debarment, etc.	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 companies for non-compliances of certain Regulation of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	The company had been suspended for trading in equity shares by BSE w.e.f. 18 th 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:

Sr. No.	Observations of the Practicing Company	Observations made in the secretarial compliance report for	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the
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	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.
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 half year ended on September, 2018 to BSE on 4 th 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. 04 th 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 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	The Company has complied with the said regulation during the financial year 2019-20.
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.	The company has taken corrective steps and not made any delay in submission of shareholding pattern during the financial year 2019-20.	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)Regulations, 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

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	submission of Financial results for the quarter ended on December, 2018 and March, 2019	ended on December, 2018 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.	and not made any delay in submission of financial results during the financial year 2019-20.	year 2019-20.
8	Reg- 33(d) of SEBI(LODR) Regulations, 2015 The Auditor of the Company is not peer reviewed	It has been observed that the statutory auditor of the Company who is issuing Limited Review Report and Audit Report on a quarterly and yearly basis is not peer reviewed by ICAI.	The company has appointed new auditor having peer review certificate.	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.	The company has not provided supporting for the dispatch of Annual Report	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)	It has been observed that the website of the	The Company has taken necessary	The Company has Complied with

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	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 SEBI(LODR) Regulations, 2015.	action and updated the website of the Company as per the requirement of Regulation- 46 of SEBI (LODR) Regulations, 2015.	Regulation- 46 of SEBI (LODR) Regulations, 2015 in the Financial year 2019-20.
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.	The company has not taken any effective steps for the mentioned violation in the current financial year.	The company is yet to comply with the requirement of regulation - 47 of SEBI(LODR) Regulations, 2015
13	Regulation 55A of SEBI (Depository Participant) Regulations, 1996 Delay in submission of Regulation 55A Reconciliation of Share Capital Audit Report on BSE for the quarter ended on December- 2018 and March, 2019	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 with the said regulation on later date as and when it had received the data from RTA.	The company has taken effective steps and submitted Reg 55A with in prescribed time during the financial year 2019-20.	The Company has complied with the said regulation for the financial year 2019- 20.
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.

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(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 Company.			
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(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
Babubhai Shah

Digitally signed by Anish
Babubhai Shah
Date: 2020.07.28 19:06:05
+05'30'

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