



Prakash Industries Limited

Srivan, Bijwasan, New Delhi - 110061

CIN : L27109HR1980PLC010724

Tel. : 25305800, 28062115 Fax : 91-11-28062119

E-mail : pilho@prakash.com Website : www.prakash.com

PIL/SE/SCR/2022

30th May, 2022

Listing Department
National Stock Exchange of India Ltd.
Exchange Plaza, 5th Floor, Plot No. C/1
G Block, Bandra-Kurla Complex, Bandra (E)
Mumbai - 400051

Listing Department
BSE Ltd.
Phiroze Jeejeebhoy Towers
Dalal Street,
Mumbai - 400001

Company Symbol : PRAKASH

Company Code : 506022

Sub: Secretarial Compliance Report of the Company under Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 for the Financial Year ended 31st March, 2022

Dear Sir / Madam,

Pursuant to Regulation 24A of the SEBI (LODR) Regulations, 2015, we are enclosing herewith Annual Secretarial Compliance Report issued by M/s. B K Bohra & Associates, Practising Company Secretaries for the financial year ended 31st March, 2022.

Kindly take the same on your record.

Thanking you,

Yours faithfully,
for **Prakash Industries Limited**

Arvind
(Arvind)
Compliance Officer

Encls : as above





“Secretarial Compliance Report of Prakash Industries Limited”

[Pursuant to Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019]

To,
Prakash Industries Limited
15 KM Stone, Delhi Road
Hissar, Haryana – 125044.

Sub.: Secretarial Compliance Report of Prakash Industries Limited (CIN: L27109HR1980PLC010724) for the Financial year ended 31st March, 2022

I, **Bhoopendra Kumar Bohra**, Proprietor of **B K Bohra & Associates**, Practicing Company Secretaries have examined:

- All the documents and records made available to me and explanations provided by Prakash Industries Limited (“the listed entity”),
- The filings/ submissions made by the listed entity to the stock exchanges,
- Website of the listed entity,
- Any other document/filing, as may be relevant which has been relied upon to make this certification,

for the financial year ended 31st March, 2022 (“Review Period”) in respect of compliance with the provisions of:

- The Securities and Exchange Board of India Act, 1992 (“SEBI Act”) and the Regulations, circulars, guidelines issued thereunder, and
- 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:-

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; (**Not attracted during the period under review.**)
- Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (**Not attracted during the period under review.**)
- Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (**Not attracted during the period under review.**)
- Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; (**Not attracted during the period under review.**)
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009; (**Not attracted during the period under review.**)
- Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993;

and circulars/ guidelines issued thereunder,

and based on the above examination, I hereby report that, during the Review Period:



(1)

(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	Proviso to Regulation 7 (1) of SEBI (LODR) Regulations, 2015.	Delay in complying with the provisions of said Regulations by the Company after Number of security holders of the Company crossed One Lakh during the First Quarter (i.e. Quarter ending June 30, 2021 to till September 25, 2021).	The Stock Exchanges (BSE & NSE) had imposed fines amounting Rs.2,07,680/- each, which were paid by the entity. The listed entity had applied for waiver of partial fine which is under consideration with BSE & NSE.
2	Sub-point 4 of Point 4 of SEBI Circular SEBI/HO/CFD/DIL2/CIR/P/2019/94 dated August 19, 2019	Delay in filing of application for getting trading approval of 75,00,000 Equity Shares issued on conversion of Convertible Equity Warrants.	The Stock Exchanges (BSE & NSE) had imposed fines amounting Rs.70,800/- each, which were paid by the entity. The listed entity had applied for waiver of fine which was accepted by NSE and the same is under consideration with BSE.

(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 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:

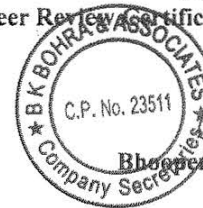
Sr. No.	Action taken by	Details of violation	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any
1	Stock Exchanges (NSE & BSE)	The listed entity had a delay in compliance of Proviso to Regulation 7 (1) of SEBI (LODR) Regulations, 2015	NSE & BSE imposed fines of Rs.2,07,680/- (incl. of GST) each	The listed entity had appointed M/s. Skyline Financial Services Pvt. Ltd., a SEBI registered Category I RTA as RTA of the Company w.e.f. 25 th September, 2021. The fines imposed by NSE & BSE were paid by the entity. Application for waiver of partial fine is still under consideration with BSE & NSE.
2	Stock Exchanges (NSE & BSE)	The listed entity was filed application 3 days late for getting trading approval of 75,00,000 Equity Shares issued during the year as per Sub-point 4 of Point 4 of SEBI Circular SEBI/HO/CFD/DIL2/CIR/P/2019/94 dated August 19, 2019.	NSE & BSE imposed fines of Rs.70,800/- (incl. of GST) each.	The listed entity had paid the fines imposed by NSE & BSE. The listed entity had applied for waiver of fine which was accepted by NSE and the same is under consideration with 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... (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
NONE				

For B K Bohra & Associates
Company Secretaries
Peer Review Certificate No. : 1997/2022



Bhoppendra Kumar Bohra
(Proprietor)
ACS No. 62344
CP No. 23511
UDIN: A062344D000262115

Place : New Delhi
Date : 03rd May, 2022