

May 10, 2021

To,
Corporate Relations Department
BSE Limited,
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai-400 001

Through: BSE Listing Centre

Scrip Code: 540788
Security ID: ASPIRA

Sub: Annual Secretarial Compliance Report for the year ended 31st March 2021

Ref: SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019 ("said Circular")

In terms of Clause 3(b) of the said Circular, please find enclosed copy of Annual Secretarial Compliance Report dated May 8, 2021 for the Financial Year 2020-2021 issued by our Secretarial Auditor Mr. SantoshKumar K. Pandey, Practicing Company Secretary.

Kindly take the same on your record.

Thanking you,

For Aspira Pathlab & Diagnostics Limited



Nikunj Mange
Executive Director
DIN: 08489442



Encl: As above

SANTOSHKUMAR KAMLESHCHANDRA PANDEY

Practicing Company Secretary

ACS No: 8546/ COP No: 5484

Add: Bunglow No 14 Rajvilas Haveli Kothi CHS Ltd, Ghodbunder Road, Chitalsar,
Manpada, Thane – 400610 Maharashtra

Mob: +91 9821051427, E-mail: pandeysk2004@yahoo.co.in



Annual Secretarial Compliance Report

(Pursuant to Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015)

Secretarial compliance report of Aspira Pathlab & Diagnostics Limited for the year ended 31st March, 2021.

I, Santoshkumar Pandey have examined:

- (a) all the documents and records made available to us and explanation provided by Aspira Pathlab & Diagnostics Limited (“the listed entity”),
- (b) the filings/submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) Such other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31st March, 2021 (“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; **Applicable to the Company during the period of Audit to the extent of its Equity shares being listed at BSE Limited.**
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **Applicable to the Company as the Company has issued Equity shares on Preferential basis to Non-Promoters of the Company.**
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; **Applicable pursuant to allotment of equity shares on preferential basis and relevant disclosures were made to BSE Limited.**
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **Not Applicable as No buy back of shares was made by the Company.**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **Not Applicable**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Not Applicable**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **Not Applicable.**

SANTOSHKUMAR KAMLESHCHANDRA PANDEY

Practicing Company Secretary

ACS No: 8546/ COP No: 5484

Add: Bunglow No 14 Rajvilas Haveli Kothi CHS Ltd, Ghodbunder Road, Chitalnar,
Manpada, Thane – 400610 Maharashtra

Mob: +91 9821051427, E-mail: pandeysk2004@yahoo.co.in



- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; **Applicable pursuant to allotment of equity shares on preferential basis and necessary disclosures were made to BSE Limited.**
- (i) All other regulation and circulars/ guidelines issued thereunder and as applicable to the Company from time to time.

and based on the above examination, I 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:- **Nil**

<i>Sr.No</i>	<i>Compliance Requirement (Regulations/ circulars / guidelines including specific clause)</i>	<i>Deviations</i>	<i>Observations/ Remarks of the Practicing Company Secretary</i>
Nil			

- (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 hereunder: **Nil**

<i>Sr. No.</i>	<i>Action taken by</i>	<i>Details of violation</i>	<i>Details of action taken e.g. fines, warning letter, debarment, etc.</i>	<i>Observations/ remarks of the Practicing Company Secretary</i>
		Nil		

SANTOSHKUMAR KAMLESHCHANDRA PANDEY

Practicing Company Secretary

ACS No: 8546/ COP No: 5484

Add: Bunglow No 14 Rajvilas Haveli Kothi CHS Ltd, Ghodbunder Road, Chitalsar,
Manpada, Thane – 400610 Maharashtra

Mob: +91 9821051427, E-mail: pandeyk2004@yahoo.co.in



(d) The listed entity has taken the following actions to comply with the observations made in previous reports: **Not Applicable since this report is being issued for the first time and accordingly no action was required to be taken by the Company.**

Sr.No	Observations of the Practicing Company Secretary in previous Reports	Observations made in the secretarial Compliance report for the year ended 31 st March, 2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
	Not Applicable			

I further report that there was no event of appointment/ re-appointment/ resignation of statutory auditor of the Company during the review period and the Company was in compliance with Para 6(A) and 6(B) of Circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019.

I have conducted online verification & examination of record, as facilitated by the Company due to Covid-19 and subsequent lockdown situation for the purpose of issuing this report.

Santoshkumar K. Pandey
(Practicing Company Secretary)
Membership No:8546
COP: 5484
UDIN: **A008546C000260996**
Place: Thane
Date: 08/05/2021