

May 27, 2022.

Senior General Manager- Listing Compliance  
BSE Limited, 24<sup>th</sup> Floor,  
P J Towers, Dalal Street,  
Mumbai 400001



Respected Sir,

**Ref.:- Scrip Code: 507864**

**Sub.:- Secretarial Compliance Report for the year ended 31<sup>st</sup> March, 2022.**

**Ref.:- Pursuant to Regulation 24A(2) of SEBI (LODR) Regulations, 2015 read with SEBI Cir Ref. no.CIR/CFD/CMD1/27/2019 dated February 08, 2019**

This is in compliance with above mentioned SEBI (LODR) Regulations and SEBI Circular for the captioned subject, please find attached herewith Secretarial Compliance Report for the year ended 31<sup>st</sup> March, 2022.

Please find attached the above and kindly acknowledge receipt of the same.

Thanking you,

Yours truly,  
For **PIONEER INVESTCORP LIMITED**

A handwritten signature in black ink, appearing to read 'Amit Chandra', written over a white background.

**AMIT CHANDRA  
COMPANY SECRETARY**

Encl.:- a.a.

# Aspi Bhesania

Practising Company Secretary

688, Dinshaw Master Road, Parsi Colony, Dadar, Mumbai -400 014.

Mobile : 9892748525. Email :aspibhesania@yahoo.co.in

## Secretarial Compliance Report of Pioneer Investcorp Limited for the year ended 31.03.2022

I, Aspi Bhesania, have examined:

- (a) all the documents and records made available to us and explanation provided by Pioneer Investcorp 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 to the company during the review period).**
- (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 to the company during review period).**
- (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; **(Not applicable to the company during the review period).**
- (g) Securities and Exchange Board of India ( Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **(Not applicable to the company during the review period).**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) The Securities and Exchange Board of India (Merchant Bankers ) Regulations, 1992;
- (j) The Securities and Exchange Board of India (Portfolio Managers) Regulations, 1993 and circulars/ guidelines issued thereunder;

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Bhesania

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# Aspi Bhesania

Practising Company Secretary

688, Dinshaw Master Road, Parsi Colony, Dadar, Mumbai -400 014.

Mobile : 9892748525. Email :aspibhesania@yahoo.co.in

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; expect in respect of matters specified below:-

Sr. No.	Compliance Requirement (Regulations/circulars/ guidelines including specific clause	Deviations	Observations/Remarks of the Practising Company Secretary
<b>NIL</b>			

- (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 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 Practising Company Secretary
<b>NIL</b>				

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

Sr. No.	Observations/Remarks of the Practising Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended 31 <sup>st</sup> March 2021	Action taken by listed entity, if any	Comments of the Practising Company Secretary on the actions taken by the listed entity
<b>Not Applicable</b>				

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**Aspi Bhesania**  
**Practising Company Secretary**  
**ACS No. 6119, C P No: 9657**  
**UDIN : A006119D000409797**  
**Date : 27.05.2022**  
**Place : Mumbai**