

May 27, 2022

To,
The Department of Corporate Services
Bombay Stock Exchange Limited
1st Floor, P.J. Towers,
Dalal Street
Mumbai - 400001

Dear Sir/Madam,

Sub: Secretarial Compliance Report for the year ended 31st March, 2022

Company: Paramount Cosmetics (India) Limited

Ref: Script ID: PARMCOS-B Script Code: 507970

In compliance with the provision of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed herewith the secretarial compliance report from M/s. K. P. Ghelani & Associates, Practising Company Secretaries, for the year ended March 31, 2022.

Kindly take on your record and acknowledge the same.

Yours sincerely,

For Paramount Cosmetics (India) Limited



Hena Shah
Company Secretary & Compliance Officer

Encl: Secretarial Audit Report from M/s K. P Ghelani & Associates for the year ended on March 31, 2022.

PARAMOUNT COSMETICS (INDIA) LIMITED

CIN: L24240GJ1985PLC008282

Regd. Office: Plot No. 165/B-15 & 16, 2nd Phase G.I.D.C, Vapi, District Valsad, Gujarat - 396195

Corp. office: 902-904, 9th Floor, Prestige Meridian-1, 29 M.G. Road,

Bangalore - 560001

Tel: 080-25320870 / 71 / 25327357

Email: compliance.officer@paramount.com

website: www.paramount.com





**SECRETARIAL COMPLIANCE REPORT
OF**

PARAMOUNT COSMETICS (INDIA) LIMITED
FOR THE YEAR ENDED MARCH 31, 2022

I, Keyur Ghelani, Proprietor of K. P. Ghelani & Associates., Company Secretaries have examined:

- (a) all the documents and records made available to us and explanation provided by PARAMOUNT COSMETICS (INDIA) 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 March 31, 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 there under; and
- (b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India ("SEBI");

The specific Regulations, whose provisions and the circulars/guidelines issued there under, 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; **Not Applicable to the Company during the Review Period**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **Not Applicable to the Company during the Review Period**
- (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;

and circulars/ guidelines issued there under; 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 there under, except in respect of matters specified below:

Sr. No.	Compliance Requirement (Regulations / Circulars / Guidelines including specific clause)	Deviations	Observations / Remarks of the Practising Company Secretary
1	Regulation 34 of SEBI (LODR) for filing of Annual Report with Stock Exchange	The Company has late filed Annual Report with Exchange	Company has late filed Annual Report with Stock Exchange
2	Regulation 18(1) of SEBI (LODR) for Constitution of Audit Committee (March 2021, June 2021 and September 2021)	The Company has not constitute an Audit Committee as per regulation due to vacancy of director	Company has re-constitute an Audit Committee w.e.f. August 09, 2021
3	Regulation 19(1) of SEBI (LODR) for Constitution of Nomination and Remuneration Committee (June 2021 and September 2021)	The Company has not constitute an Nomination and Remuneration Committee as per regulation due to vacancy of director	Company has re-constitute an nomination and Remuneration Committee w.e.f. August 09, 2021
4	Regulation 20(1) of SEBI (LODR) for Constitution of Stakeholders Relationship Committee (June 2021)	The Company has not constitute an Stakeholders Relationship Committee as per regulation due to vacancy of director	Company has re-constitute an Stakeholders Relationship Committee w.e.f. August 09, 2021
5	Regulation 30 Of SEBI (LODR) For Appointment of Company Secretary (KMP) And Compliance Officer	The Company has not appointed Company Secretary due to Pandemic Covid-19.	Company has not appointed Company Secretary from May 13, 2021 till September 28, 2021.

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/guidelines issued there under in so far 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 there under:

Sr. No.	Action taken by	Details of Violation	Details of action taken e.g. fines, warning letters, debarment etc.	Observations / Remarks of the Practising Company Secretary, if any
1	Bombay Stock Exchange (BSE)	Non payment of fines for Non compliance under Reg 27(2), Reg 31, Reg 33, Reg 34, Reg 23(9), Reg 17 (1), Reg 18 (1), Reg 19 (1), Reg 20 (1) and Reg 20 (2)	Freezing of promoters share holdings	Total fines amounting to Rs. 2128189/-. Company has again written a letter for waiver of fines

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

Sr. No.	Observations of the Practising Company Secretary in previous reports	Observations made in the Secretarial compliance report for the year ended March 31, 2021	Action taken by listed entity, if any	Comments of the Practising Company Secretary on the actions taken by the listed entity
1	Non Compliance of Reg 27(2) - Corporate Governance Report for the quarter ended March 2020	Company has filed the report after due date	Company has written a letter for waiver of fines	Company has received waiver letter from BSE dated May 06, 2022
2	Non Compliance of Reg 23(9) - Submission of disclosure of related party for the half yearly	Company has filed the disclosure after due date	Company has written a letter for waiver of fines	Company has again written a letter for waiver of fines





K. P. Ghelani & Associates
Company Secretaries

	September 2020			
3	Non Compliance of Reg 17(1) - Combination of Executive Director and Non-Executive Director for the end of quarter March 2020	Company has in default of combination of Executive and Non-Executive Director	Company has written a letter for waiver of fines	Company has again written a letter for waiver of fines
4	Non Compliance of Reg 18(1) - Constitution of Audit Committee for the quarter ended March 2020	Company has in default of constitution of Audit committee due to vacancy of director	Company has written a letter for waiver of fines	Company has again written a letter for waiver of fines
5	Non Compliance of Reg 20(1) - Constitution of Stakeholders Relationship Committee for the quarter ended March 2020	Company has in default of constitution of Audit committee due to vacancy of director	Company has written a letter for waiver of fines	Company has again written a letter for waiver of fines

Date: May 26, 2022
Place: Rajkot

For K. P. Ghelani & Associates
Company Secretaries



CS Keyur Ghelani
Proprietor
Mem. No. 33400
C.P. No. 12468
UDIN: A033400D000328563