

**CORPORATE OFFICE :**

1st floor, 137 Hubtown Solaris,  
N.S. Phadke Road, Opp. Teli Gali,  
Near Andheri East West Flyover Bridge.  
Andheri East. Mumbai - 400069 (INDIA).  
CIN No. L24232MP1989PLC005390  
Tel. : 91-22-6863 4200 / 6863 4206  
Fax : (91) 022-2206 3929  
E-mail : poltd@panchsheelorganics.in  
Website : <http://www.panchsheelorganics.com>



**Panchsheel  
Organics  
Limited**

**MFGRS. OF: BULK DRUGS  
& FORMULATIONS**

31<sup>st</sup> July, 2020

To,  
The Corporate Relations Department,  
**BSE Limited,**  
PJ Tower,  
Dalal Street, Fort,  
Mumbai - 400 001.

Dear Sir/Madam,

**Sub:** Annual Secretarial Compliance Report for the Financial Year 2019-20.

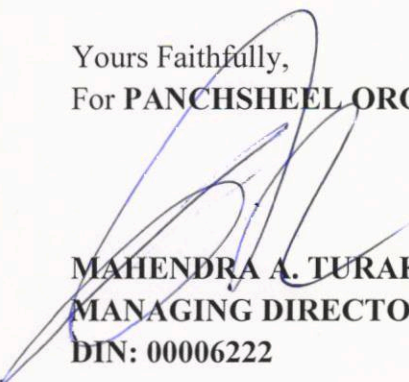
**Ref:** Security Code: 531726

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 20105, read with SEBI Circular CIR/CFD/CMD1/27/2019 dated 8<sup>th</sup> February, 2019, please find enclosed herewith the Annual Secretarial Compliance Report of the Company for the Financial Year 2019-20.

Kindly take the same on records.

Thanking You.

Yours Faithfully,  
For **PANCHSHEEL ORGANICS LIMITED**

  
**MAHENDRA A. TURAKHIA**  
**MANAGING DIRECTOR**  
**DIN: 00006222**

Encl: As Above.



# GMS & CO.

## Practicing Company Secretaries

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Office: 302-A-wing, Rushabh Enclave, Near Ambemata Temple, Bhayander(w), Thane-401101.

**Secretarial Compliance Report**  
*Panchsheel Organics Limited*  
For the year ended 31.03.2020

I, Mr. Gaurang Shah, Proprietor of GMS & Co., Company Secretary in Practice have examined:

- (a) All the documents and records made available to us and explanation provided by *Panchsheel Organics 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 31.03.2020 ("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;



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- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018- **Not Applicable**;
- (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**;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) The Securities and Exchange Board of India (Employee Stock Option Scheme and Employee Stock Purchase Scheme) Guidelines, 1999- **Not Applicable**;
- (j) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993
- (k) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009- **Not Applicable**
- (l) The Securities and Exchange Board of India (Mutual Fund) Regulation 1996- **Not Applicable**.

and circulars/ guidelines issued thereunder;

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

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	Year	Compliance Requirement (Regulations/ circulars / guidelines including specific	Deviations	Observations/ Remarks of the Practicing Company Secretary
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		clause)		
1.	2019-2020	Reg 27 Corporate Governance Report	Delay in filing for the Quarter ended September, 2019	Delay in filing for the Quarter ended September, 2019 by seven days.
		Reg 31 Shareholding Pattern	Delay in filing for the Quarter ended September, 2019	Delay in filing for the Quarter ended September, 2019 by twenty four days.
		Reg 6 Appointment of Compliance Officer	Non- Appointment of Company Secretary	Non-Appointment of Company Secretary/late inform regarding appointment
		Reg 27 Corporate Governance Report	Delay in filing for the Quarter ended June, 2019	Delay in filing for the Quarter ended September, 2019 by twelve days.
		Reg 13 Investor Complaints	Delay in filing for the Quarter ended June, 2019	Delay in filing for the Quarter ended September, 2019 by eight days.
		Reg 29(2) & (3)	Delay in giving Prior intimation	Delay in filing for the Quarter ended September, 2019 by one day.

(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.	BSE Limited	Reg27- September 2019	Notice levying penalty of Rs. 16520/- vide Notice No. LIST/COMP/Reg 27(2) & Reg 17 to 21/ Sep - 19/531726/219/2019-20	The Company has paid the respective penalty.



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## Practicing Company Secretaries

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2.	BSE Limited	Reg 31- September 2019	Fine of Rs. 56640/-	The Company has not paid the penalty till date.
3.	BSE Limited	Reg 6(1)	Notice levying penalty of Rs. 36580/- vide Notice No. LIST/COMP/531726/REG 6(1)-Marc-19/225/2019-20	The Company has not paid the penalty till date
4.	BSE Limited	Reg 27- June 2019	Fine of Rs. 28320/-	The Company has not paid the penalty till date
5.	BSE Limited	Reg 13- June 2019	Notice levying penalty of Rs. 8260/- vide Notice No. LIST/COMP/reg 13(3)-June-19/145/2019-20	The Company has paid the respective penalty.
6.	BSE Limited	Prior intimation of Board Meeting- Reg 29(2) & (3)	Notice levying penalty of Rs. 11800/- vide Notice No. LIST/COMP/531726/Reg 29(2) May19/89/2019-20	The Company has paid the levied penalty
7.	BSE Limited	Reg 27- March 2019	Fine of Rs. 59000/-	The Company has not paid the levied penalty till date.
8.	BSE Limited	Reg 18(1)- March 2019	Notice levying penalty of Rs. 212400/- vide Notice No. LIST/COMP/Reg 27(2) & Reg 17 to 21/ March 19/531726/37/2019-20	The Company has filed Waiver Application to BSE Limited for the same.
9.	BSE Limited	Reg 19(1) & (2)- March 2019	Notice levying penalty of Rs. 212400/- vide Notice No. LIST/COMP/Reg 27(2) & Reg 17 to 21/ March 19/531726/37/2019-20	The Company has filed Waiver Application to BSE for the same.
10.	BSE Limited	Reg 33- March 2019	Notice levying penalty of Rs. 106200/- vide Notice No. LIST/COMP/531726/REG	The Company has not paid the levied penalty till date.



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			33 Mar19/99/2019-20	
11.	BSE Limited	Reg 27- December 2018	Fine of Rs. 35400/-	The Company has not paid the levied penalty till date.
12.	BSE Limited	Reg 13- September 2018	Notice levying penalty of Rs. 46020/- vide Notice No. LIST/COMP/531726/REG 13(3) Sep18/970/2018-19	The Company has paid the respective penalty.
13.	BSE Limited	Reg 33- June 2018	Fine of Rs. 23600/-	The Company has not paid the levied penalty till date.
14.	BSE Limited	Reg 33- March 2018	Notice levying penalty of Rs. 59000/- vide Notice No. LIST/COMP/Reg33 Mar-18/531726/406/2018-19	The Company has not paid the levied penalty till date.

(d) The listed entity has taken the following actions to comply with the observations made in previous reports: Not Applicable

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended... (NA)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
NA	NA	NA	NA	NA

Place: Mumbai

Date:31.07.2020

For GMS & Co.,

Gaurang M. Shah  
Mr. Gaurang Shah



UDIN: A032581B000541287