



**PASUPATI  
SPINNING  
& WEAVING  
MILLS LTD.**

CORP. OFFICE : 127-128, 1st FLOOR, TRIBHUVAN COMPLEX, ISHWAR NAGAR,  
MATHURA ROAD, NEW DELHI-110065 (INDIA) PHONE : 91-11-47632200  
E-mail : ho@pasupatitextiles.com ; admin@pasupatitextiles.com  
Website : http://www.pasupatitextiles.com  
CIN - L74900HR1979PLC009789

**Dated: 17/06/2021**

**The Secretary  
The Stock Exchange, Mumbai,  
P.J.Tower, Dalal Street,  
Mumbai-400001**

**Sub: Annual Secretarial Compliance Report for the financial year ended 31.03.2021**

**Ref: Scrip Code: 503092  
Scrip Id : PASUSPG**

Dear Sir/Madam,

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/ CFD/CMD1/27/2019 dated 8<sup>th</sup> February, 2019; please find enclosed herewith Annual Secretarial Compliance Report for the financial year ended 31<sup>st</sup> March, 2021 issued by Anand Sharma & Associates, Practicing Company Secretaries.

You are requested to take the same on record.

Thanking You

**Yours Faithfully**

**For Pasupati Spinning and Weaving Mills Ltd**

  
**Deepika Malhotra  
Company Secretary**

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**ANNUAL SECRETARIAL COMPLIANCE REPORT  
OF  
PASUPATI SPINNING AND WEAVING MILLS LIMITED  
FOR THE YEARENDED 31<sup>ST</sup> MARCH, 2021**

(Pursuant to Regulation 24A of SEBI (LODR) Regulations, 2015 vide SEBI Circular No.CIR/CFD/CMD1/27/2019)

To,  
The Board of Directors,  
PASUPATI SPINNING AND WEAVING MILLS LIMITED  
Village Kapriwas,  
Dharuhera District,  
Rewari-Haryana

We Anand Sharma & Associates, Company Secretaries have examined:

- (a) the documents and records made available to us and explanation provided by PASUPATI SPINNING AND WEAVING MILLS LIMITED (CIN: L74900HR1979PLC009789)("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) all other document/ filing, as may be relevant, which have been relied upon to make this report for the year ended 31<sup>st</sup> March, 2021 ("Review Period") in respect of compliance with the provisions of:
  - I. the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
  - II. 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**
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations,2018;**Not Applicable**
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations,2011;**Applicable**
- (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;**Applicable**
- (i) Other Regulations, as applicable to the Company and circulars/ guidelines issued thereunder;

and based on the examination of above, we 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:-

S. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1	Intimation of Trading Window Closure in terms of Code of Conduct for Regulating, Monitoring and Reporting of trading by insiders pursuant to SEBI (Prohibition of Insider Trading Regulation), 2015	Delay in filing of Intimation of closure of Trading Window certificate U/R SEBI (Prohibition of Insider Trading Regulation) 2015	The Company has not filed the Intimation of closure of Trading Window within the time stipulated under the prescribed regulation for each of the quarters under audit period.
2	Submission of the annual audited standalone financial results along with audit report under regulation 33 of SEBI (LODR) Regulation, 2015	Delay in Submission of the annual audited standalone financial results along with audit report under regulation 33 of SEBI (LODR) Regulation, 2015	The Company has not submitted the annual audited standalone financial results along with audit report within the time stipulated under the prescribed regulation or the extended period stipulated under SEBI vide various circulars for FY 2019-2020, April to June Period for F.Y. 2020-2021. July to September Period for F.Y. 2020-2021 and October to December Period for F.Y. 2020-2021
3	Filing of Certificate under regulation 74(5) of SEBI (Depositories and Participants) Regulation 2018	Delay in Filing of Certificate under regulation 74(5) of SEBI (Depositories and Participants) Regulation 2018	The Company has not filed the compliance certificate within the time stipulated under the prescribed regulation for April to June Period for F.Y. 2020-2021 and July to September Period for F.Y. 2020-2021.
4.	Filing of Audit Report under regulation 76 of SEBI (Depositories and	Delay in Filing of audit report under regulation 76 of SEBI (Depositories and	The Company has not filed the compliance audit report within the time stipulated under the





	Participants) Regulation 2018	Participants) Regulation 2018	prescribed regulation for April to June Period for F.Y. 2020-2021 and July to September Period for F.Y. 2020-2021.
5	Submission of Compliance Certificate under regulation 7(3) of SEBI (LODR) Regulation, 2015	Delay in Filing of Compliance Certificate under regulation 7(3) of SEBI (LODR) Regulation, 2015	The Company has not filed the compliance certificate within the time stipulated under the prescribed regulation for July to September Period for F.Y. 2020-2021.
6	Filing of Certificate from Practicing Company Secretary under regulation 40(9) of SEBI (LODR) Regulation, 2015	Delay in Filing of Certificate under regulation 40(9) of SEBI (LODR) Regulation, 2015	The Company has not filed the compliance certificate within the time stipulated under the prescribed regulation for July to September Period for F.Y. 2020-2021.
7	Advertisement in Newspaper under regulation 47 of SEBI (LODR) Regulation, 2015	Non publishing of notice of Board meeting in newspaper.	The Company has not published the notice of board meeting dated September 25, 2020 where financial results were discussed.

(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 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 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.	SEBI	Delay in Filing of Financial Results for various quarters	Fines were levied. However, the same was duly replied by the Company to not take any action due to the outbreak of COVID-19.	

(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 31 <sup>st</sup> March, 2020 (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
1. The Company has made its website up to date and fully functional. 2. The Company has paid all the dues in respect of annual listing fees. 3. The company is trying to make a good compliance management team. So that in future company can make all compliances within stipulated time.				

**Note:**

4. List of all the observations in the report for the previous year along with the actions taken by the listed entity on those observations;
5. List of all observations in the reports pertaining to the periods prior to the previous year in case the entity has not taken sufficient steps to address the concerns raised/observations;

For Anand Sharma & Associates  
Company Secretaries

*Anand Parkash Sharma*  
Anand Parkash Sharma  
Company Secretary

M. No. 2836

COP No. 20141

Date: 16<sup>th</sup> June, 2021

Place: Delhi

UDIN:F002836C000474802