



June 22, 2020

BSE Ltd.
Corporate Relationship Department
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai – 400001

Scrip Code: 500456

Sub : Annual Secretarial Compliance Report for the Year Ended 31st March, 2020

Ref : Regulations 24A of of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

Pursuant to Regulation 24(A) of SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015 read with SEBI circular no. CIR/CFD/CMD1/27/2019 dated February 08, 2019, please find enclosed herewith Annual Secretarial Compliance Report dated 22nd June, 2020 as issued by V.K. Sharma & Co., Company Secretaries for the financial year ended March 31, 2020.

We request you to please take the above on record.

Thanking you,

Yours faithfully,

For Pasupati Acrylon Limited


Company Secretary

Bharat Kapoor
Company Secretary & Compliance Officer

Encl: as above

PASUPATI ACRYLON LTD.

CORPORATE OFFICE : M-14, CONNAUGHT CIRCUS (MIDDLE CIRCLE), NEW DELHI-110 001 (INDIA) PHONE: EPABX- 47627400
 Fax : 91-11-47627497, 47627498 E-MAIL : delhi@pasupatiacrylon.com VISIT OUR SITE : <http://www.pasupatiacrylon.com>
 REGD. OFFICE & WORKS : KSHIPUR ROAD, THAKURDWARA- 244 601, DISTT. MORADABAD (U.P.)
 E-MAIL : works@pasupatiacrylon.com • pasupati_tkd@rediffmail.com
 CIN : L50102UP1982PLC015532

V.K SHARMA & CO.

Company Secretaries

B-1902, Ace Aspire, Techzone 4,

Greater Noida (West)-201306

Mobile: 9811009592, 9818816592

E-Mail: vks_cosecy@yahoo.com

**SECRETARIAL COMPLIANCE REPORT
OF
PASUPATI ACRYLON LIMITED FOR THE YEAR ENDED 31st MARCH 2020**

We, **V. K. Sharma & Co. Company Secretaries** have examined:

- (a) all the documents and records made available to us and explanation provided by **Pasupati Acrylon 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 **31st March 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;
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;

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- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

and circulars/ guidelines issued there under;

and based on the above examination, We hereby report that, during the Review Period:

The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued there under except that:

Sr.No	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1	Reg. 17(1)	The composition of Board is skewed since 29.02.2020 due to vacancy caused by the demise of an Independent Director.	No default as such up to 31.03.2020 as the company has not held a board meeting from the date of vacancy till the end of financial year on 31.03.2020. The Listing regulations requires the vacancy to be filled at the earliest but not later than immediate next board meeting or three months whichever is later.

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- (a) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under insofar as it appears from our examination of those records.
- (b) 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 letter, debarment, etc.	Observations / remarks of the Practicing Company Secretary, if any.
No action taken by SEBI/Stock Exchange				

- (c) 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 2019	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
	N/A	At the time of online filing of the Report on 10.10.2018 on the BSE Listing Center an inadvertent error of choosing	Penalty of Rs. 219480 paid by the company.	Default made good and penalty paid

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		file occurred and file containing only covering letter was filed.		
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Place: Greater Noida

Date: 22 June 2020

For V. K. Sharma & Co.

Company Secretaries

VIJAY KUMAR SHARMA
Digitally signed by VIJAY
KUMAR SHARMA
Date: 2020.06.22
15:23:55 +05'30'

(V. K. Sharma)

FCS No.: 3440

C P No.: 2019

UDIN: F003440B000364561