

PALASH SECURITIES LIMITED

CIN - L74120UP2015PLC069675

REGD. OFFICE - P.O. HARGAON, DIST SITAPUR (U.P.), PIN - 261 121

Phone No. (05862) 256220-221; Fax No.: (05862) 256 225

E-mail - palashsecurities@birlasugar.org; Website-www.birla-sugar.com

30th June, 2020

The Secretary
National Stock Exchange of India Ltd.
Exchange Plaza, 5th Floor
Plot No. C/1, G Block
Bandra- Kurla Complex, Bandra (E)
Mumbai 400 051

Symbol : PALASHSECU

The Dy. General Manager
Corporate Relationship Department
BSE Ltd.
1st Floor, New Trading Ring,
Rotunda Building
P.J. Towers, Dalal Street, Fort
Mumbai-400 001
Stock Code : 540648

Dear Sir,

Sub: Annual Secretarial Compliance Report for the year ended 31st March, 2020

Pursuant to the Regulation 24A of Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, enclosed please find the Annual Secretarial Compliance Report for the financial year 2019-20.

You are requested to kindly take the above information on record.

Thanking you,

Yours faithfully,

For Palash Securities Limited



Mayuri Raja
Company Secretary
ACS - 26022



Encl - as above

VINOD KOTHARI & COMPANY

Practising Company Secretaries
1006-1009, Krishna Building, 224 A.J.C. Bose Road
Kolkata – 700 017, India
Phone: +91 – 33 – 2281 7715 | 3742 | 4001 0157
email: corplaw@vinodkothari.com
Web: www.vinodkothari.com
[Unique Code – P1996WB042300](https://www.mca.gov.in/unique-code)
PAN No -AAMFV6726E
UdyogAdhar Number – WB10D0000448
GSTIN:19AAMFV6726E1ZR

Secretarial compliance report of Palash Securities Limited for the year ended March 31, 2020

We, M/s Vinod Kothari & Company, have examined:

- (a) all the documents and records made available to us and explanation provided by Palash Securities 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, 2020 ("Review Period") in respect of compliance with the provisions of :

- (a) the Securities and Exchange Board of India Act, 1992 ("Act") and the Regulations, circulars, guidelines issued thereunder; and
- (b) the Securities Contracts (Regulation) Act, 1956, 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 (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (c) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (d) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (e) The Securities and Exchange Board of India (Registrars to an Issue and Share Agents) Regulations, 1993;
- (f) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- (g) The Securities and Exchange Board of India (Debenture Trustee) Regulations, 2017, Not applicable



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Delhi office: A-467, First Floor, Defence Colony, New Delhi 110016, Ph -011-41315340

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- (h) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018: Not applicable;
- (i) The Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014: Not applicable;
- (j) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008: Not applicable;
- (k) The Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013: Not applicable and circulars/ guidelines issued thereunder;

and based on the above examination, 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:-

Sr. No	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practising Company Secretary
None			

- (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:



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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, if any.
None				

(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 the previous reports	Observations made in the secretarial compliance report for the year ended 31 st March, 2020	Actions taken by the listed entity, if any	Comments of the Practising Company Secretary on the actions taken by the listed entity
None				

(e) The listed entity has complied with the provisions of SEBI Circular CIR/CFD/CMD1/114/2019 dated October 18, 2019, in terms of Para 6(A) and 6(B) of the said circular and has suitably modified the terms of appointment of its statutory auditors vide addendum letter dated November 09, 2019.

For M/s Vinod Kothari & Company
Company Secretaries in Practice



Munmi Phukon
Partner

Membership No: A60355

CP No.: 22846

UDIN: A060355B000378277

Date: June 25, 2020
Place: Kolkata

Mumbai office: 403-406, Shreyas Chambers, Fort, Mumbai – 400001, Ph- 022-22614021
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