

NORTHERN SPIRITS LIMITED

REG. OFF: 5A, WOODBURN PARK ROAD, WOODBURN CENTRAL,
UNIT 603 6TH FLOOR KOLKATA-700020
CIN: L15500WB2012PLC185821

To
The Listing Operations Department,
BSE Limited,
Phirozee Jeejeebhoy Towers,
Dalal Street,
Mumbai-400001

Date: 09/09/2020

BSE Scrip Code: 542628

Respected Sir/Madam,

Sub: Submission of Annual Secretarial Compliance Report for the year ended 31st March, 2020 as per Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulation 2015.

Pursuant to Regulation 24A of the Listing Obligations and Disclosure Requirements read with SEBI circular no CIR/CFD/CMD1//27/2019 dated February 8, 2019 please find enclosed herewith Annual Secretarial Compliance Report of the Company for the year ended 31st March, 2020 issued by Anurag Fatehpuria, Practising Company Secretary.

Kindly take the same on your record.

Thanking you,

Yours faithfully

For Northern Spirits Limited
Northern Spirits Ltd.

Nikita Sureka

Company Secretary

Nikita Sureka

Company Secretary

Enclsd: As above

Secretarial Compliance Report of M/s. Northern Spirits Limited for the year ended 31st March, 2020

I, Anurag Fatehpuria, a Practicing Company Secretary have examined:

- (a) all the documents and records made available to us and explanation provided by **M/s. Northern Spirits 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; **Not Attracted during the year under review.**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **Not attracted during the year under review.**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Not attracted during the year under review**
- (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) (other regulations as applicable)

and circulars/ guidelines issued thereunder;

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 thereunder, except in respect of matters specified below:-

SL No	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	NIL	NIL	NIL

- (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/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.	NIL	NIL	NIL	NIL

(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... <i>(The years are to be mentioned)</i>	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	Annual Secretarial Compliance Report was not applicable to the Company during the previous Financial Year 2018-2019 as the Company was not listed during that Financial year.			



Anurag Fatehpuria

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Anurag Fatehpuria
Practicing Company Secretary
ACS No.: 34471
C P No.: 12855
UDIN: A034471B000669083

Place: Kolkata
Date: 05-09-2020