



CIN : L24232MP1983PLC002320

# PANJON<sup>®</sup>

LIMITED

27-05-2021

To  
The General Manager,  
Listing Department  
BSE Limited  
Phiroze Jeejeebhoy Towers,  
Dalal Street,  
Mumbai- 400 001

SCRIP CODE: 526345

Subject: Report Under Regulation Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ["SEBI (LODR) Regulations"]

Dear Sir/Madam,

Please find enclosed herewith Report Under Regulation Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ["SEBI (LODR) Regulations"] for the year ended March 31, 2021.

Kindly take the same on record.

Thanking you.

For Panjon Ltd;

  
Jay Kothari, Director

Managing Director  
(DIN: 00572543)



01, Panjon Farm House, Near Hinkargiri Jain Tirth,  
Airport- Bijasan Road, Indore 452005 (M.P.) INDIA  
Phone : +91-731-2622503, +91 9300008787  
Website: [www.panjon.in](http://www.panjon.in) • E-mail: [info@panjon.in](mailto:info@panjon.in)



**Secretarial compliance report of Panjon Limited (for the year ended 31<sup>st</sup> March, 2021  
issued under Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements)  
Regulations, 2015**

I have examined:

- (a) all the documents and records made available to us and explanation provided by Panjon Limited (**“the listed entity”**),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the Company,
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification.

For the year ended 31<sup>st</sup> March, 2021 (“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;

During the year under review, the Company has filed its quarterly, half yearly and yearly returns as required under Regulation 7, 13, 27, 30, 31, 33, 34, 40, 76, 44 and other applicable regulation

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**RAMESH CHANDRA MISHRA & ASSOCIATES**  
Company Secretary in Practice & Corporate Legal Advisor

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with BSE in time. The Company has disclosed the relevant material facts and events to both the Exchanges in time.

- b. Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;

During the year under review, the Company has not issued any capital.

- c. Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;

During the year under review, the Company has not received any communication for Substantial Acquisition of Shares and Takeovers of the company.

- d. Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;

During the year under review, the Company has not brought back any of its Securities.

- e. Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;

During the year under review, the Company has not issued any shares/ securities to its employee.

- f. Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;

During the year under review, the Company has not issued any debt securities.

- g. Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;

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Company Secretary in Practice & Corporate Legal Advisor

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During the year under review, the Company has not issued any Non-Convertible and Redeemable Preference Shares.

h. Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

During the year under review, the Company has not received declaration from the Promoters, Directors and Senior Managerial Personnel as required under the regulation regarding the holding of Company securities and there was no trading in the securities of the Company by the Promoters, Directors and Senior Managerial Personnel.

i. Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018; and circulars/ guidelines issued thereunder;

and circulars/ guidelines issued thereunder;

**The Company was compulsorily delisted from the SE. The same was challenged by the Company before the Securities Appellate Tribunal. Pursuant to the direction of Hon'ble SAT , BSE has restored the company.**

**The company has filed in-principle approval for revocation of suspension.**

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:

Sr. No.	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1		No deviation	RAMESH CHANDRA MISHRA Digitally signed by RAMESH CHANDRA MISHRA Date: 2021.06.01 12:21:18 +05'30'



During the period of delisting the SE portal did not allow the company to file any returns as required under SEBI LODR from 1<sup>st</sup> Quarter. However subsequently the company as directed by the SE filed the respective returns with SE.

(b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far 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: N.A.

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.
		Not Applicable		

(d) The listed entity has taken the following actions to comply with the observations made in previous reports: N.A.

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Company Secretary in Practice & Corporate Legal Advisor

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the yearended31/03/2019 (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
		Not Applicable		

**For Ramesh Chandra Mishra & Associates.**

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**Place: Mumbai**

**Date: 01/06/2021**

**UDIN: F005477C000404700**

**Ramesh Mishra  
Practicing Company Secretary  
C.P. No.: 3987  
M. No.: 5477**