

# **PANKAJ PIYUSH TRADE AND INVESTMENT LTD**

Regd. Off. :314, 3rd Floor, Opposite Plot No. 39, R. G. Mall, Sector-9, Rohini, New Delhi-110085  
(CIN : L65990DL1982PLC256291)

Website : [www.pptinvestment.in](http://www.pptinvestment.in)

E-mail : [infopptinvestment@gmail.com](mailto:infopptinvestment@gmail.com)

Ph. : 011-42804171, 9891442777

**To,  
The Manager-Listing Department  
BSE Limited  
Phiroze Jeejeebhoy Towers,  
Dalal Street, Mumbai- 400001  
Scrip Code: 506122**

**Date: June 26, 2021**

**Ref: SEBI Circular CIR/CFD/CMD1/27/2019 dated 8<sup>th</sup> February, 2019**

**Sub: Annual Secretarial Compliance Report for the Financial Year ended 31<sup>st</sup> March, 2021**

Dear Sir,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular CIR/CFD/CMD1/27/2019 dated 8th February, 2019, please find the enclosed Annual Secretarial Compliance Report for the financial year ended March 31, 2021.

This is for your information and records.

**For Pankaj Piyush Trade and Investment Limited**

**Kanika Arora**

**Company Secretary**

**Place: Delhi**



ANNUAL SECRETARIAL COMPLIANCE REPORT  
OF  
PANKAJ PIYUSH TRADE & INVESTMENT LIMITED FOR THE FINANCIAL YEAR ENDED  
31<sup>ST</sup> MARCH, 2021

[Pursuant to Circular CIR/CFD/CMD1/27/2019 dated February 08, 2019 in compliance with Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

To,  
The Board of Directors,  
Pankaj Piyush Trade & Investment Limited  
Regd. Office: 314, 3<sup>rd</sup> Floor, Opposite Plot No. 39  
R.G. Mall Sector-9, Rohini, New Delhi-110085

We, VMS & Co., Practicing Company Secretaries have examined:

- (a) All the documents and records made available to us and explanation provided by **Pankaj Piyush Trade & Investment Limited (CIN: L65990DL1982PLC256291)** ("the listed entity"),
- (b) The filings/ submissions made by the listed entity to the stock exchanges i.e. BSE Limited,
- (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 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 there under; 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:

- (i) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (ii) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 (Not applicable as the Company has not issued any further share capital during the review period);



- (iii) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (iv) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 **(Not applicable as the Company has not brought back/proposed to any of its securities during the review period);**
- (v) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 **(Not applicable as the Company has not issued any shares to its employees during the review period);**
- (vi) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 **(Not applicable as the Company has not issued and listed debt securities during the review period);**
- (vii) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 **(Not applicable as the Company has not issued and listed any Non-Convertible and Redeemable Preference Shares during the review period);**
- (viii) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and the circulars and guidelines issued thereunder;
- (ix) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- (x) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993;
- (xi) Other regulations as applicable to the Company 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 Practicing Company Secretary |
|---------|---|------------|--|
| 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 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. |
|---------|-----------------|----------------------|---|--|
| 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 31 <sup>st</sup> March, 2021 | Actions taken by the listed entity, if any | Comments of the Practicing Company Secretary on the actions taken by the listed entity |
|---------|--|--|--|--|
| NIL     |  |  |  |  |

We further report that there was no event of appointment/re-appointment/resignation of Statutory Auditor of the Company during the review period and the Company was in compliance with Para 6(A) and Para 6(B) of Circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019.

**For VMS & Co.,  
Company Secretaries**

**CS Megha Sharan**  
**Company Secretary in Practice**  
M. No.: F9802  
C.P. No.: 12171  
UDIN: F009802C000517331



**Date: 25.06.2021**  
**Place: Delhi**