



Ideas for a new day

June 23, 2020

Compliance Department, <b>BSE Limited,</b> Phiroze Jeejeebhoy Tower, Dalal Street, Fort, Mumbai- 400001	Compliance Department, <b>National Stock Exchange of India Ltd.</b> Exchange Plaza, Plot No. C/1, G-Block, Bandra-Kurla Complex Bandra-(E), Mumbai-400051
<b>Scrip Code :- 539889</b>	<b>Scrip Symbol:- PARAGMILK</b>

Dear Sir/Madam,

**Sub: Annual Secretarial Compliance Report for the Financial Year ended 31st March, 2020**

Pursuant to Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD 1/27/2019 dated February 08, 2019, we have enclosed herewith the Annual Secretarial Compliance Report of the Company for the financial year ended March 31, 2020, issued by M/s. N.L. Bhatia & Associates - Practising Company Secretaries.

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

For **Parag Milk Foods Limited**

Rachana Sanganeria  
**Company Secretary and Compliance Officer**  
ACS No. 10280

Encl: As above

Parag Milk Foods Ltd.,

CIN-L15204PN1992PLC070209

**Regd. Office:** Flat No. 1 Plot No. 19, Nav Rajasthan Co-Op Housing Society, Behind Ratna Memorial Hospital,  
Senapati Bapat Road, Shivaji Nagar, Pune - 411016. Ph: +91 72764 70001

**Corporate Office:** 10<sup>th</sup> floor, Nirmal building, Nariman point, Mumbai - 40021 Tel.: 022-43005555 Fax: 022-43005580

**Website:** [www.paragmilkfoods.com](http://www.paragmilkfoods.com) | **email:** [investors@paragmilkfoods.com](mailto:investors@paragmilkfoods.com)





**N L BHATIA & ASSOCIATES**  
**PRACTISING COMPANY SECRETARIES**

Tel. : 91-022-2510 0718  
Tel. : 91-022-2510 0698  
E-mail : navnitlb@hotmail.com  
brupadhyay@hotmail.com  
Website : www.nlba.in

To,  
The Board of Directors,  
Parag Milk Foods Limited  
CIN: L15204PN1992PLC070209  
10th Floor, Nirmal Building,  
Nariman Point, Mumbai- 400021

Dear Sirs,

**Sub: Annual Secretarial Compliance Report for the Financial year 2019-20**

We have been engaged by Parag Milk Foods Limited (hereinafter referred to as the Company') bearing CIN: L15204PN1992PLC070209 whose equity shares are listed on National Stock Exchange of India Limited and BSE Limited to conduct an audit in terms of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended read with SEBI's Circular No. CIR/CFD/CMD1/27/2019 dated 08<sup>th</sup> February, 2019 and to issue the Annual Secretarial Compliance Report thereon.

It is the responsibility of the management of the Company to maintain records, devise proper systems to ensure compliance with the provisions of all the applicable SEBI Regulations and circulars/ guidelines issued thereunder from time to time and to ensure that the systems are adequate and are operating effectively.

Our responsibility is to verify compliances by the Company with provisions of all applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and issue a report thereon.

Our audit was conducted in accordance with Guidance Note on Annual Secretarial Compliance Report issued by the Institute of Company Secretaries of India and in a manner which involved such examinations and verifications as considered necessary and adequate for the said purpose. Annual Secretarial Compliance Report is enclosed.

**Place:** Mumbai  
**Date:** June 23, 2020

**For M/s N L Bhatia & Associates**  
**Practising Company Secretaries**  
**UIN: P1996MH055800**

*Navnitlal Bhatia*



**N.L. Bhatia**  
**Managing Partner**  
**FCS:1176**  
**CP. No. 422**



**Secretarial Compliance Report of Parag Milk Foods Limited for the Financial Year ended 31<sup>st</sup> March, 2020**

To,

Parag Milk Foods Limited

We, M/s N L Bhatia & Associates Practicing Company Secretaries have examined:

- a) all the documents and records made available to us and explanations provided by **Parag Milk Foods Limited ("the listed entity")**
- b) the filings/ submissions made by the listed entity to the stock exchanges.
- c) website of the listed entity.
- d) books, papers, minute books, forms and returns filed.

for the year ended 31<sup>st</sup> 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:-

- The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;





- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirement) Regulations, 2009;

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:-

<b>Sr.No</b>	<b>Compliance Requirement (Regulations/ circulars / guidelines including specific clause)</b>	<b>Deviations</b>	<b>Observations/ Remarks of the Practicing Company Secretary</b>
<b>NA</b>	<b>NA</b>	<b>NA</b>	<b>NA</b>

- 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 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:

<b>Sr. No.</b>	<b>Action taken by</b>	<b>Details of violation</b>	<b>Details of action taken E.g. fines, warning letter, debarment, etc.</b>	<b>Observations/ remarks of the Practicing Company Secretary, if any.</b>
<b>NA</b>	<b>NA</b>	<b>NA</b>	<b>NA</b>	<b>NA</b>



- 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
NA	NA	NA	NA	NA

Place: Mumbai  
Date: June 23, 2020

For M/s N L Bhatia & Associates  
Practising Company Secretaries  
UIN: P1996MH055800



*Naveen L Bhatia*

**N.L. Bhatia**  
**Managing Partner**  
FCS:1176  
CP. No. 422  
UDIN: F001176B000367498