



P. H. CAPITAL LTD.

Regd. Office : 5D, Kakad House, 5th Floor, 'A' Wing, Sir Vithaldas Thackersey Marg,
Opp. Liberty Cinema, New Marine Lines, Mumbai - 400020.
Tel. : 022-2201 9473 / 022-2201 9417 • **CIN :** L74140MH1973PLC016436
Email : phcapitaltd@gmail.com

Date: 12th April, 2019

To,

The Manager,

Bombay Stock Exchange Limited

Department of Corporate Services,

Phiroze Jeejeebhoy Tower,

Ground Floor, Dalal Street,

Mumbai – 400 001.

Dear Sir,

Sub: Non-applicability of certain regulations of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Scrip Code: 500143

This is to bring to your kind attention that, as per **Regulation 15 of the SEBI (Listing Obligations & Disclosure Requirements) Regulation, 2015 (LODR)**, the compliance with the corporate governance provisions as specified in Regulations 17, [17A], 18, 19, 20, 21, 22, 23, 24, [24A], 25, 26, 27 and clauses (b) to (i) of sub-regulation (2) of Regulation 46 and para C, D and E of Schedule V shall not apply, in respect of the Listed Entities having paid up Equity Share Capital not exceeding Rs. 10,00,00,000/- (Rupees Ten Crores Only) and Net Worth not exceeding Rs. 25,00,00,000/- (Rupees Twenty Five Crores Only).

Further also please note that as per our Financial Statements for the financial year 2017-18, **paid up Equity Share Capital of our Company is Rs. 3,00,01,000/-** (Rupees Three Crores One Thousand Only) which is less than Rs. 10 Crores and **the Net worth is Rs. 11,41,86,164/-** (Rupees Eleven Crores Forty One Lakhs Eighty Six Thousand One Hundred and Sixty Four Only) which is less than Rs. 25 Crores.

Therefore, the provisions of abovementioned regulations of SEBI (Listing Obligations & Disclosure Requirement) Regulations, 2015 **are not applicable to our Company.**

However, your good office had imposed a penalty of Rs. 2,17,120/- (Rupees Two Lakhs Seventeen Thousand One Hundred And Twenty Only) vide its letter dated 31st October, 2018 for non-compliance of the provisions of Regulation 18(1) of SEBI (LODR) Regulations, 2015. The aforesaid letter and the acknowledgement for the penalty payment has been enclosed herewith as **Annexure A.**

Also, your good office had imposed a further penalty of Rs. 4,34,240/- (Rupees Four Lakhs Thirty Four Thousand Two Hundred And Forty Only) vide its letter dated 31st January, 2019 for non-compliance of the provisions of Regulation 18(1) and Regulation 19(1)/19(2) of SEBI (LODR)



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Regulations, 2015. The aforesaid letter and the acknowledgement for this penalty payment has also been enclosed herewith as **Annexure B**.

Therefore, overall we have paid a penalty of **Rs. 6,51,360/- (Rupees Six Lakhs Fifty One Thousand Three Hundred and Sixty Only)**.

Since, as per Regulation 15 of the LODR, Regulation 18 and 19 of the said regulation are not applicable to our company, we kindly request your good office to please refund the amount of penalty wrongly imposed and paid by us.

And we hereby again declare that all the regulations mentioned in Regulation 15 of the LODR are not applicable to our company since its inception.

Please consider the above and kindly try to process our refund at the earliest and also take on record the non-applicability of aforementioned provisions of the LODR on our company as per Regulation 15.

We would also like to affirm that all the information provided in this application are true to the best of our knowledge and belief and that no material fact regarding the same has been concealed, omitted and falsified.

We would be very grateful to your good office if our request for the above refund could be processed as soon as possible and would be obliged if your officials look into the matter personally and arrange for our refund on a priority basis.

Thanking you,

Yours Faithfully,

FOR AND ON BEHALF OF
P H CAPITAL LIMITED



RIKEEN DALAL
DIRECTOR
Din: 01723446

Enclosures: 1) Annexure A.
2) Annexure B.

P. H. CAPITAL LTD.

5-D, Kakad House, 5th Floor, 'A' Wing, Sir Vithaldas Thackersey Marg, New Marine Lines,
Mumbai – 400 020. Tel . : (Off.) 022-2201 9473 / 2201 9417 Fax : 2201 2105.
CIN : L74140MH1973PLC016436, EMAIL : phcapitaltd@gmail.com

Date: 19th March, 2019

To,
The Manager,
Listing Compliance Department,
Bombay Stock Exchange Limited
Phiroze Jeejeebhoy Tower,
Ground Floor, Dalal Street,
Mumbai – 400 001.

003629

Dear Sir/Ma'am,

Sub: Notice dated 31st January, 2019 w.r.t non-compliance with the provisions of Regulation 17(1), 18(1), 19(2), 20(2), 21(2) of SEBI (LODR) Regulations, 2015

Scrip Code: 500143

**Ref: LIST/COMP/500143/Reg. 27(2) and Reg. 17 to 21/Dec 18 / 500143/1093/2018-19
E-Mail dated March 18, 2019 relating to suspension of companies w.e.f April 9, 2019 on account of non-compliance with Regulation 17 and/or 18 of SEBI (LODR) Regulations, 2015.**

With reference to the captioned subject, we would like to bring to your kind attention that we are hereby giving a cheque of Rs. 4,34,240/- (Four Lakhs Thirty Four Thousand Two Hundred and Forty Only) for full and final settlement of the penalty levied on us with respect to non-compliance under Reg. 18(1) and 19(1)/19(2).

The Cheque details are:

Drawn on Bank Name: HDFC Bank

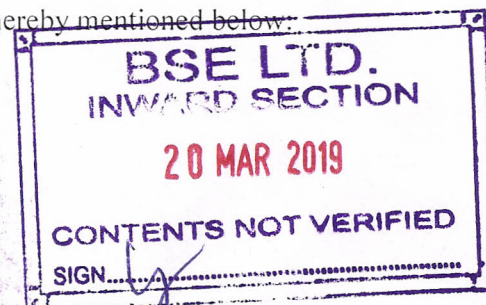
Cheque No: 944440

Dated: 19.03.2019

Also please be informed that the entire shareholdings of the promoter and promoter group of our company as well as all other securities held in their demat account(s) have been frozen as per Point No. 2 of the aforesaid email till further notice but we have already initiated a buying and selling transaction in one of our demat accounts which if failed shall lead to huge financial and reputational loss for our company.

So, we kindly request your good office to unfreeze the aforementioned shareholdings of the promoter and promoter group in our company as well as all other securities held in the demat account(s) of the promoter and promoter group as soon as possible as we have already complied with the said regulations and are making the payment of the said penalty via. above mentioned cheque details.

The Revised constitutions of the Committees are hereby mentioned below:



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CIN : L74140MH1973PLC016436, EMAIL : phcapitaltd@gmail.com

Reconstitution of Audit Committee under Reg. 18:

Sr. No.	Name of the Director	Designation in Committee	Designation
1.	Mr. Roshan Jain	Chairman	Non-Executive Independent Director
2.	Mr. Mukesh Kumar Jain	Member	Non-Executive Independent Director
3.	Mr. Rikeen Dalal	Member	Executive Director

Reconstitution of Nomination and Remuneration Committee under Reg. 19:

Sr. No.	Name of Member	Designation in Committee	Designation
1.	Mr. Mukesh Kumar Jain	Chairman	Non-Executive Independent Director
2.	Mr. Roshan Jain	Member	Non-Executive Independent Director
3.	Mr. Rikeen Dalal	Member	Executive Director

We, request you to please consider the above and kindly do the needful at the earliest as we are facing transactional issues with respect to the freezed accounts.

Thanking You,

For and on behalf of
P H CAPITAL LIMITED

RIKEEN DALAL
DIRECTOR
DIN: 01723446



101-104 TULSIANI CHAMBERS FREE PRESS JOURNAL MARG
 NARIMAN POINT, MUMBAI-400 021, MAHARASHTRA
 RTGS / NEFT IFSC : HDFC0000001

Imperia
 Premium Banking

A/c Payee

Weekly Holiday on SUNDAY

9	0	3	2	0	1	9
D	D	M	Y	Y	Y	Y

Valid for 3 months only

Pay **BSE LTD.**

Or Bearer

Rupees **Four Lakh Thirty Four Thousand Two**

या धारक को

Hundred Forty Only

अदा करें

₹ ****4,34,240.00**

A/c. No.
 अ/c. नं.

00012050004179

Brn: 0001 Pdt:205
 CA

Payable at par through clearing/transfer at all branches of HDFC BANK LTD

For PH CAPITAL LTD

Authorised Signatories

Please sign above / कृपया यहाँ हस्ताक्षर करें

⑈944440⑈ 400240003⑈ 634693⑈ 29



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03.12.2018

To,
Bombay Stock Exchange Limited
Department of Corporate Services,
Listing Compliance
Phiroze Jeejeebhoy Tower,
Ground Floor, Dalal Street,
Mumbai - 400001.

Dear Sir,

Sub: Details of Payment of fines Non compliance with the provisions of Regulations 18(1) of SEBI (LODR) Regulations , 2015.

Ref.: P H Capital Limited BSE Code : 500143.

With reference to your letter dt 31.10.2018 received on 20.11.2018 regarding Payment of fines Non compliance with the provisions of Regulations 18(1) of SEBI (LODR) Regulations , 2015.

With reference to the above , we are enclosing herewith cheque bearing no. 944308 dated 03.12.2018 for Rs 2,17,120 drawn on HDFC Bank Ltd favoring BSE Ltd towards fine for Non Compliance for Quarter Ended 30th Sept 2018.

Kindly acknowledge the receipt of the same.

Thanking You,

For P.H. CAPITAL LIMITED

Samir Desai
Compliance Officer



IPO F	DEPT. OF CORPORATE SERVICES	MF LIST
COPML	BSE LTD. MUMBAI	LISTING FEE
BUY BACK	03 DEC 2018	REVOLVING
OTHERS	DEPT. OF CORPORATE SERVICES	CRD



101-104 TULSIANI CHAMBERS FREE PRESS JOURNAL MARG
NARIMAN POINT, MUMBAI-400 021, MAHARASHTRA
RTGS / NEFT IFSC : HDFC0000001



A/c Payee

Weekly Holiday on SUNDAY

0	3	1	2	2	0	1	8
D	D	M	M	Y	Y	Y	Y

Valid for 3 months only

Or Bearer

या धारक को

Pay BSE LTD.

Rupees रुपये Two Lakh Seventeen Thousand One Hundred Twenty Only

अवा करें

₹ **2,17,120.00

A/c. No.
00012050004179

00012050004179

Brn: 0001 Pdt:205
CA

Payable at par through clearing/transfer at all branches of HDFC BANK LTD

For P H CAPITAL LTD

Authorised Signatories


Please sign above / कृपया यहाँ हस्ताक्षर करें

⑈944308⑈ 400240003⑈ 634693⑈ 29



BSE LTD.

Regd. Off.:25th Floor P.J.Towers
Dalal Street Mumbai 400001 022 - 22721233 / 34
TAX INVOICE (ORIGINAL FOR RECIPIENT)

GSTIN: UR Customer: P.H. Capital Ltd. 5D Kakad House 5th Floor, A Wing Sir Vithaldas Thackersey Marg, New Marine Lines MUMBAI MAHARASHTRA India 400020 Place of supply: MAHARASHTRA 27				Date: 06-DEC-18 Invoice No: 271190044259 Reference No: SOP500143/Dec-18 Original Invoice: Original Invoice Date: Period From: 01-JUL-18 Period To: 30-SEP-18 Due Date: 06-DEC-18 Scrip Code:						
Sr. No.	Description	HSN/SAC	Disc.	Taxable value	CGST		SGST		Total	
					Rate	Amount	Rate	Amount		
1	Penalty from Companies-SOP	997152		184000	9%	16560	9%	16560	217120	
Total:					184000		16560		16560	217120
Invoice Description:										
Total Invoice Value (In figure) : 217120 Total Invoice Value (In Words) : TWO LAKHS SEVENTEEN THOUSAND ONE HUNDRED TWENTY RUPEES ONLY										
Please Note: 1. Cheques/DD must be drawn in favour of "BSE Ltd.", payable at Mumbai. 2. In addition to the above, any taxes, duties and levies, etc as applicable from time to time shall also be payable extra. 3. If any amount is paid after the expiry of due date then interest shall be levied @ 18% p.a. from next day of due date till the date of payment. 4. Disputes, if any, are subjected to Mumbai Jurisdiction only. 5. No Reverse Charge applicable on the Invoice. 6. Customer are requested to check GST credit in their GSTR2A after due date of filing GSTR1 which is 10 th of next month as per current GST provision.										
Registrations PAN : AACCB6672L CIN : L67120MH2005PLC155188 GSTIN : 27AACCB6672L1ZA					For BSE LTD.  Authorized Signatory					