

PRESSURE SENSITIVE SYSTEMS (INDIA) LIMITED

CIN: - L24295MH1987PLC045502

Registered Office Address: - 706, 179, 180, Kamlacharan, Jawahar Ngr Rd No. 2, Goregoan (W), Nr. Railway Gate No. 27, Mumbai City, Maharashtra – 400 062, India

Administrative Office : 441 Block-C, 1-1 TPS-14 Sumel-11 Indian Textile Plaza, Shahibaug, Ahmedabad – 380 004 Gujarat, India

Email ID: - pressuresensitive@gmail.com, **Website:** - www.pressuresensitive.xyz;

Phone: +91 22 – 2781 2052 / 2512 8948

Date: June 1, 2023

To,

Listing Compliance Department

BSE Limited

Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai – 400 001

Dear Sir / Madam,

Sub: Submission of Annual Secretarial Compliance Report for the year ended March 31, 2023

Ref: Pressure Sensitive Systems (India) Limited (Security ID: PRESSURS, Security Code: 526773)

Pursuant to SEBI Circular CIR/CFD/CMD1/27/2019 dated February 8, 2019, we are submitting herewith Annual Secretarial Compliance Report of the Company for the year ended March 31, 2023, issued by CS Anand Lavingia, Practicing Company Secretary.

Kindly take the same on your record and disseminate the same on your website and oblige us.

Thanking You,

Yours faithfully,

For, PRESSURE SENSITIVE SYSTEMS (INDIA) LIMITED

Bhagyesh Jayantibhai Mistry
Managing Director
DIN: 09832939





**SECRETARIAL COMPLIANCE REPORT OF PRESSURE SENSITIVE SYSTEMS (INDIA) LIMITED
FOR THE FINANCIAL YEAR ENDED MARCH 31, 2023**

I, Anand Sureshbhai Lavingia, have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by Pressure Sensitive Systems (India) Limited (hereinafter referred as 'the listed entity'), having its Registered Office at 706, 179, 180, Kamlacharan, Jawahar Ngr Rd No. 2, Goregoan (W), Nr. Railway Gate No. 27 Mumbai - 400 062, Maharashtra, India Secretarial Review was conducted in a manner that provided me a reasonable basis for evaluating the corporate conducts/statutory compliances and to provide my observations thereon.

Based on my verification of the listed entity's books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Review, I hereby report that the listed entity has, during the review period covering the financial year ended on March 31, 2023 complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter;

I have examined;

- (a) all the documents and records made available to me and explanation provided by Pressure Sensitive Systems (India) 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 report,

for the year ended March 31, 2023 ("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) The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (b) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (c) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
- (e) The Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021;
- (f) The Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021;
- (g) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (h) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;



and based on the above examination, I hereby report that, during the Review Period:

- I. (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.	1	2	3	4
Compliance Requirement (Regulations / circulars / guidelines including specific clause)	The listed entity shall submit a compliance certificate to the exchange, within thirty days from the end of the financial year.	The listed entity shall submit a secretarial compliance report in such form as specified, to stock exchanges, within sixty days from end of each financial year.	Submission of a certificate from a practicing company secretary within thirty days from the end of the financial year, certifying that all certificates have been issued within thirty days of the date of lodgement for transfer, subdivision, consolidation, renewal, exchange or endorsement of calls/allotment monies.	The listed entity shall publish financial results, as specified in regulation 33 SEBI (Listing Obligations and Disclosure Requirements) 2015
Regulation / Circular No.	Regulation 7(3) of SEBI (Listing Obligations and Disclosure Requirements) 2015	Regulation 24(A) of SEBI (Listing Obligations and Disclosure Requirements) 2015	Regulation 40(10) of SEBI (Listing Obligations and Disclosure Requirements) 2015	Regulation 47 of SEBI (Listing Obligations and Disclosure Requirements) 2015
Deviations	The Company has not filled the certificate as required Regulation 7(3) of SEBI (Listing Obligations and Disclosure Requirements) 2015 for the year ended 31 March, 2022	The Company has not submitted secretarial compliance report as required Regulation 24(A) of SEBI (Listing Obligations and Disclosure Requirements) 2015 for the year ended 31 March, 2022	The Company has not filled the certificate as required Regulation 40(10) of SEBI (Listing Obligations and Disclosure Requirements) 2015 for the year ended 31 March, 2022	The Company has not published newspaper advertisements for financial results for the quarter and year ended March 31, 2022, as required under Regulation 47 of SEBI (Listing Obligations and Disclosure Requirements) 2015 during the review period.



Sr. No.	1	2	3	4
Action Taken by	-	-	-	-
Type of Action	-	-	-	-
Details of Violation	The Company has not filled the certificate as required Regulation 7(3) of SEBI (Listing Obligations and Disclosure Requirements) 2015 for the year ended 31 March, 2022	The Company has not submitted secretarial compliance report as required Regulation 24(A) of SEBI (Listing Obligations and Disclosure Requirements) 2015 for the year ended 31 March, 2022	The Company has not filled the certificate as required Regulation 40(10) of SEBI (Listing Obligations and Disclosure Requirements) 2015 for the year ended 31 March, 2022	The Company has not published newspaper advertisements for financial results for the quarter and year ended March 31, 2022, as required under Regulation 47 of SEBI (Listing Obligations and Disclosure Requirements) 2015 during the review period.
Fine Amount	Nil	Nil	Nil	Nil
Observations / Remarks of the Practicing Company Secretary	The Company has not filled the certificate as required Regulation 7(3) of SEBI (Listing Obligations and Disclosure Requirements) 2015 for the year ended 31 March, 2022	The Company has not submitted secretarial compliance report as required Regulation 24(A) of SEBI (Listing Obligations and Disclosure Requirements) 2015 for the year ended 31 March, 2022	The Company has not filled the certificate as required Regulation 40(10) of SEBI (Listing Obligations and Disclosure Requirements) 2015 for the year ended 31 March, 2022	The Company has not published newspaper advertisements for financial results for the quarter and year ended March 31, 2022, as required under Regulation 47 of SEBI (Listing Obligations and Disclosure Requirements) 2015 during the review period.
Management Response	Refer Note 1 hereunder	Refer Note 1 hereunder	Refer Note 1 hereunder	Refer Note 1 hereunder
Remarks	Nil	Nil	Nil	Nil



Sr. No.	5	6	7	8
Compliance Requirement (Regulations / circulars /guidelines including specific clause)	The listed entity shall publish financial results, as specified in regulation 33 of SEBI (Listing Obligations and Disclosure Requirements) 2015	Confirmation Certificate in the matter of Regulation 74(5) of Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018.	Submission of Initial Disclosure pursuant to SEBI Circular no. SEBI/HO/DDHS/P/CIR/2 021/613 dated 10/08/2021 (updated on April 13, 2022) - fund raising by issuance of debt securities by Large Entities for the financial year 2022-23	Confirmation Certificate in the matter of Regulation 74(5) of Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018.
Regulation / Circular No.	Regulation 47 of SEBI (Listing Obligations and Disclosure Requirements) 2015	Regulation 74(5) of Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018.	SEBI Circular no. SEBI/HO/DDHS/P/CIR/2 021/613 dated 10/08/2021 (updated on April 13, 2022) - fund raising by issuance of debt securities by Large Entities.	Regulation 74(5) of Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018.
Deviations	The Company has not published newspaper advertisements for financial results for the quarter ended June 30, 2022, as required under Regulation 47 of SEBI (Listing Obligations and Disclosure Requirements) 2015 during the review period.	The Company has not filled the certificate as required Regulation 74(5) of SEBI ((Depositories and Participants) Regulations, 2018 for the quarter ended 31 March, 2022	The Company has not submitted Initial Disclosure pursuant to SEBI Circular no. SEBI/HO/DDHS/P/CIR/2 021/613 dated 10/08/2021 (updated on April 13, 2022) - fund raising by issuance of debt securities by Large Entities for the financial year 2022-23	The Company has not filled the certificate as required Regulation 74(5) of SEBI ((Depositories and Participants) Regulations, 2018 for the quarter ended 30 June, 2022
Action Taken by	-	-	-	-
Type of Action	-	-	-	-



Sr. No.	5	6	7	8
Details of Violation	The Company has not published newspaper advertisements for financial results for the quarter ended June 30, 2022, as required under Regulation 47 of SEBI (Listing Obligations and Disclosure Requirements) 2015 during the review period.	The Company has not filled the certificate as required Regulation 74(5) of SEBI ((Depositories and Participants) Regulations, 2018 for the quarter ended 31 March, 2022	The Company has not submitted Initial Disclosure pursuant to SEBI Circular no. SEBI/HO/DDHS/P/CIR/2021/613 dated 10/08/2021 (updated on April 13, 2022) - fund raising by issuance of debt securities by Large Entities for the financial year 2022-23	The Company has not filled the certificate as required Regulation 74(5) of SEBI ((Depositories and Participants) Regulations, 2018 for the quarter ended 30 June, 2022
Fine Amount	Nil	Nil	Nil	Nil
Observations / Remarks of the Practicing Company Secretary	The Company has not published newspaper advertisements for financial results for the quarter ended June 30, 2022, as required under Regulation 47 of SEBI (Listing Obligations and Disclosure Requirements) 2015 during the review period.	The Company has not filled the certificate as required Regulation 74(5) of SEBI ((Depositories and Participants) Regulations, 2018 for the quarter ended 31 March, 2022	The Company has not submitted Initial Disclosure pursuant to SEBI Circular no. SEBI/HO/DDHS/P/CIR/2021/613 dated 10/08/2021 (updated on April 13, 2022) - fund raising by issuance of debt securities by Large Entities for the financial year 2022-23	The Company has not filled the certificate as required Regulation 74(5) of SEBI ((Depositories and Participants) Regulations, 2018 for the quarter ended 30 June, 2022
Management Response	Refer Note 1 hereunder	Refer Note 1 hereunder	Refer Note 1 hereunder	Refer Note 1 hereunder
Remarks	Nil	Nil	Nil	Nil

Note 1: Since the Company was suspended at BSE Limited and due to non-payment of dues to RTA, the old Management could not get details which are required to be submitted. Moreover, previous Directors have not made few of the compliances applicable to the Company. the new Directors are trying to find the way out for making necessary compliances.



(b) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	Compliance Requirement (Regulations / circulars / guidelines including specific clause)	Regulation / Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations / Remarks of the Practicing Company Secretary	Management Response	Remarks
The Company had not obtained any reports under Regulation 24A of SEBI (LODR) Regulations, 2015 prior to this report. Accordingly, this point is not required to be commented up on.										



II. Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations / Remarks by PCS*
1.	Compliances with the following conditions while appointing/re-appointing an auditor	As under	
	i. If the auditor has resigned within 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter; or	NA	No such instances took place.
	ii. If the auditor has resigned after 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter as well as the next quarter; or	NA	No such instances took place.
	iii. If the auditor has signed the limited review/ audit report for the first three quarters of a financial year, the auditor before such resignation, has issued the limited review/ audit report for the last quarter of such financial year as well as the audit report for such financial year.	NA	No such instances took place.
2.	Other conditions relating to resignation of statutory auditor		
	i. Reporting of concerns by Auditor with respect to the listed entity/its material subsidiary to the Audit Committee:	As under	
	a. In case of any concern with the management of the listed entity/material subsidiary such as non-availability of information / noncooperation by the management which has hampered the audit process, the auditor has approached the Chairman of the Audit Committee of the listed entity and the Audit Committee shall receive such concern directly and immediately without specifically waiting for the quarterly Audit Committee meetings.	NA	No such instances took place.
	b. In case the auditor proposes to resign, all concerns with respect to the proposed resignation, along with relevant documents has been brought to the notice of the Audit Committee. In cases where the proposed resignation is due to non-receipt of information / explanation from the company, the auditor has informed the Audit Committee the details of information/ explanation sought and not provided by the management, as applicable.	NA	No such instances took place.





Anand Lavingia

ACS, LLM(Spl.), B.Com
Practicing Company Secretary

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations / Remarks by PCS*
	c. The Audit Committee / Board of Directors, as the case may be, deliberated on the matter on receipt of such information from the auditor relating to the proposal to resign as mentioned above and communicate its views to the management and the auditor.	NA	No such instances took place.
	ii. Disclaimer in case of non-receipt of information: The auditor has provided an appropriate disclaimer in its audit report, which is in accordance with the Standards of Auditing as specified by ICAI / NFRA, in case where the listed entity/ its material subsidiary has not provided information as required by the auditor.	NA	No such instances took place.
3.	The listed entity / its material subsidiary has obtained information from the Auditor upon resignation, in the format as specified in Annexure-A in SEBI Circular CIR/ CFD/CMD1/114/2019 dated 18th October, 2019.	NA	No such instances took place.

III. I hereby report that, during the review period the compliance status of the listed entity is appended as below

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations / Remarks by PCS
1.	Secretarial Standards: The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.	Yes	None
2.	Adoption and timely updation of the Policies:		
	• All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities	Yes	None
	• All the policies are in conformity with SEBI Regulations and have been reviewed & updated on time, as per the regulations / circulars / guidelines issued by SEBI	Yes	None



Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations / Remarks by PCS
3.	Maintenance and disclosures on Website:		
	• The Listed entity is maintaining a functional website	Yes	None
	• Timely dissemination of the documents/ information under a separate section on the website	Yes	None
	• Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re-directs to the relevant document(s) / section of the website	No	The web links provided in annual corporate governance reports are not specific as some of the links lead to the web address of the Company.
4.	Disqualification of Director: None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	Yes	We have relied on the Declaration submitted by each of the Director regarding non-disqualification under Section 164 of the Companies Act, 2013.
5.	Details related to Subsidiaries of listed entities have been examined w.r.t.:		
	(a) Identification of material subsidiary companies	NA	The Company does not have any Material Subsidiary.
	(b) Disclosure requirement of material as well as other subsidiaries	Yes	The Company has complied with the disclosure requirements in relation to any other Subsidiary.
6.	Preservation of Documents: The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.	Yes	None
7.	Performance Evaluation: The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial	Yes	None

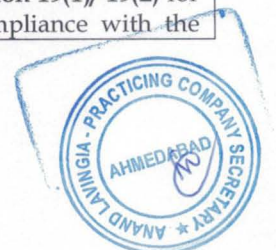




Anand Lavingia

ACS, LLM(Spl.), B.Com
Practicing Company Secretary

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations / Remarks by PCS
	year/during the financial year as prescribed in SEBI Regulations.		
8.	Related Party Transactions:		
	(a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or	Yes	None
	(b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.	NA	The Company has obtained prior approval of Audit Committee for all related party transactions
9.	Disclosure of events or information: The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.	Yes	None
10.	Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	None
11.	Actions taken by SEBI or Stock Exchange(s), if any: No action(s) has been taken against the listed entity/its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder except as provided under separate paragraph herein.	No	BSE Limited has levied following penalties on the Company vide its email dated 21/02/2023. <ul style="list-style-type: none">Rs. 300900/- under Regulation 17(1) for Non-compliance with the requirements pertaining to the composition of the Board including failure to appoint woman directorRs. 297360/- under Regulation 18(1) Non-compliance with the constitution of audit committeeRs. 257240/- under Regulation 19(1)/ 19(2) for Non-compliance with the



Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations / Remarks by PCS
			constitution of nomination and remuneration committee
12.	Additional Non-compliances, if any: No additional non-compliance observed for any SEBI regulation / circular / guidance note etc.	No	During the year under review, the Company had not complied with the requirements of composition of the Board including failure to appoint woman director, requirements of the constitution of audit committee and requirements of the constitution of nomination and remuneration committee.
13.	Compliance with the requirement of SDD by the listed entities	Yes	The Company has complied with the maintenance of SDD. However, the same is maintained by the Company in excel format as presented to us.

ASSUMPTIONS & LIMITATION OF SCOPE AND REVIEW:

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial Records and Books of Accounts of the listed entity.
4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.



Anand Lavingia

ANAND SURESHBHAI LAVINGIA
PRACTICING COMPANY SECRETARY
 ACS: 26458; COP: 11410
 PR. No.: 1589/2021
 UDIN: A026458E000439134

Date: 01-06-2023
 Place: Ahmedabad