



To,

Date: 26.06.2021

The Manager BSE Limited P. J. Towers, Dalal Street Mumbai-400001 (BSE Scrip Code: 532521)	The Manager, NSE Limited, Exchange Plaza, Bandra Kurla Complex, Bandra (E), Mumbai- 400051. (NSE Symbol: PALREDTEC)
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Dear Sir/Madam,

Sub: Annual Secretarial Compliance Report for the year ended March 31, 2021 as per Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations")

Unit: Palred Technologies Limited

Pursuant to Regulation 24A of the Listing Regulations read with SEBI Circular No. CIR/CFD/CMD1//27/2019 dated February 8, 2019, please find enclosed the annual secretarial compliance report for the year ended March 31, 2021.

This is for your information and records.

Thanking you.

Yours faithfully,
For Palred Technologies Limited



Shrutu Mangesh
Company Secretary

Enclosed: Compliance report issued by the Practicing Company Secretary



S.S. Reddy & Associates

Practicing Company Secretaries

To

M/s. Palred Technologies Limited
Plot No 2, 8-2-703/2/B, Road No 12,
Banjara Hills, Hyderabad,
Telangana, 500034

Dear Sir/Madam,

Sub: Annual Secretarial Compliance Report for the Financial Year 2020-21

We have been engaged by Palred Technologies Limited (hereinafter referred to as 'the Company') bearing CIN: L72200TG1999PLC033131 whose equity shares are listed on National Stock Exchange of India Limited (Symbol: **PALREDTEC**) and BSE Limited (Security Code: **532521**) 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 08th 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 provisions of all applicable SEBI Regulations and circulars/guidelines issued there under 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.

For S.S. Reddy & Associates

S. Sarveswar Reddy
Practicing Company Secretary
CP No: 7478, M. No. 12611



Place: Hyderabad
Date: 30.06.2021



S.S. Reddy & Associates

Practicing Company Secretaries

Secretarial Compliance Report of Palred Technologies Limited For the Financial Year Ended 31st March, 2021

We M/s. S. S. Reddy & Associates, Practicing Company Secretaries have examined:

- (a) All the documents and records made available to us and explanation provided by **Palred Technologies 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 certification,

For the year ended 31st 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 there under; and
- (b) The Securities Contracts (Regulation) Act, 1956 (“SCRA”), rules made there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India (“SEBI”);

The specific Regulations, whose provisions and the circulars/ guidelines issued there under, have been examined, include: -

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;



- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **Not Applicable**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **Not Applicable**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; and Amended Regulations 2019. **Not Applicable**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **Not Applicable**
- (h) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 to the extent applicable.
- (i) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009; **Not Applicable**
- (j) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and Amended Regulations 2018.

Circulars/guidelines issued thereunder and based on the above examination and considering the relaxations granted by the Ministry of Corporate Affairs and Securities and Exchange Board of India warranted due to the spread of the COVID-19 pandemic, 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 there under wherever applicable, 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.	Regulation 17 & 20 SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.	Non-compliance with the requirements pertaining to the composition of Committees	The Audit Committee, SRC are not duly Constituted during the period from 31.08.2020 to 30.09.2020.



- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars / guidelines issued wherever applicable, there under in so far as it appears from my/our examination of those records.
- (c) The following are the 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 there under:

Sl. 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.
1.	NSE	Regulation 17 & 20: Non-compliance with the requirements pertaining to the composition of the Committees of the Company	Rs. 5,000 per day (computed till date 30.09.2020 Therefore, Total fine amounting to Rs. 182900.	Committees of the Company are not duly Constituted due to operations of the Company affected for undergoing pandemic SARS COVID-19.

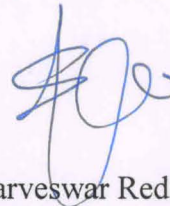
- (d) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No	Observations of the Practicing Company Secretary in previous reports	Observations made in the Secretarial compliance report for the year ended 31 st March 2019	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
NIL				



- (a) The reporting of clause 6(A) and 6(B) of the circular No. CIR/CFD/CMD 11114/2019 dated October 18, 2019 issued by the Securities and Exchange Board of India on "Resignation of statutory auditors from listed entities and their material subsidiaries" is not applicable during the Review Period.

For S.S. Reddy & Associates



Place: Hyderabad

Date: 30.06.2020

UDIN: A012611C000551699

S. Sarveswar Reddy
Practicing Company Secretary
CP No: 7478, M. No. 12611