



SHREE PUSHKAR CHEMICALS & FERTILISERS LTD.

CIN: L24100MH1993PLC071376

(A Government of India Recognised Export House)

An ISO 9001:2008 & 14001:2004 Certified Company

Office No. 301/302, 3rd Floor, Atlanta Center, Near Udyog Bhavan,

Sonawala Road, Goregaon (East), Mumbai - 400063, India.

Tel.: + 91 22 4270 2525 • Fax: + 91 22 2685 3205

Date: 30th May, 2022

National Stock Exchange of India Limited, Exchange Plaza, C-1, Block G, Bandra Kurla Complex, Bandra (East), Mumbai - 400051. Script Symbol: SHREEPUSHK	BSE Limited, P. J. Towers, Dalal Street, Mumbai - 400 001. Scrip Code: 539334
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Dear Sir/ Madam,

Subject: Submission of Annual Secretarial Compliance Report for the year ended March, 2022.

In compliance with the SEBI Circular no. CIR/CFD/CMD1/27/2019 dated February 8, 2019 and pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 please find enclosed herewith Annual Secretarial Compliance Report of Shree Pushkar Chemicals & Fertilisers Limited for the financial year ended March 31, 2022 issued by M/s. DSM & Associates, Company Secretaries.

Kindly consider this as Compliance under Listing Regulations.

Thanking you,
Yours Faithfully,

For Shree Pushkar Chemicals & Fertilisers Limited.




Nitesh Pangle
Company Secretary & Compliance Officer

.....*Stable, Sustainable & Smart Chemistry Company*.....

• Speciality Textile Dyes • Dyes Intermediates • Acids & Power • Animal Health & Nutrition • Fertilisers

Works at - B-97,B -102/103, D-10, D-18, D-25 MIDC Lote Parshuram, Taluka Khed, Dist. Ratnagiri, Maharashtra, India.

email: info@shreepushkar.com • www.shreepushkar.com

100% Wholly Owned Subsidiaries:-1. Kisan Phosphates Private Limited
2. Madhya Bharat Phosphate Private Limited



**Secretarial Compliance Report of Shree Pushkar Chemicals and Fertilisers
Limited for the year ended 31st March, 2022**

I, CS Sanam Umbargikar, partner of M/s. DSM & Associates, Company Secretaries, have examined:

- (a) all the documents and records made available to us and explanation provided by **Shree Pushkar Chemicals and Fertilisers 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/ filings, as may be relevant, which has been relied upon to make this certification,

for the year ended 31st March, 2022 ("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) 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 to the Listed Entity during Review Period);
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 (not applicable to the Listed Entity during Review Period);



- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (not applicable to the Listed Entity during Review Period);
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 (not applicable to the Listed Entity during Review Period);
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
and circulars/ guidelines issued thereunder;

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

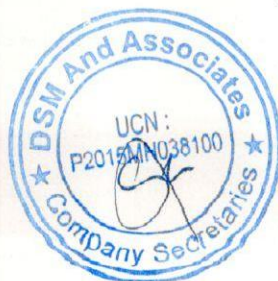
- (a) The listed entity has complied with the provisions of above Regulations and circulars/guidelines issued thereunder, except in respect of matters specified below:

Sr. No.	Compliance Requirements (Regulations/ Circulars/ guidelines including specific clause)	Deviation	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 in so far as it appears from my 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 circular/ guidelines issued thereunder:

Sr. No.	Action Taken by	Details of Violation	Details of action taken e.g. fines, warning letters, debarment etc.	Observations/ remarks of the Practicing Company Secretary, if any
1.	NSE	Reg.17 of the SEBI (LODR) Regulations, 2015, requires that the Board of Directors of the top 1000	Penalty, plus taxes, for the period of non-compliance i.e. 1 st April, 2020 to	The Company has paid the penalty under protest.



		<p>listed entities shall have at least one Independent Woman director by 1st April, 2020.</p> <p>There was noncompliance of the requirements during the period of 1st April, 2020 to 9th November, 2020.</p>	<p>9th November, 2020, has been levied by NSE and same has been paid by the Company</p>	
2.	NSE	<p>Reg.6 of the SEBI (LODR) Regulations, 2015, the Company is required to appoint Qualified Company Secretary as Company Secretary and Compliance Officer of the Company. Whereas there was non appointment of Company Secretary and Compliance Officer.</p>	<p>The entire amount of penalty has been waived off by the NSE.</p>	<p>The entire amount of penalty has been waived off by the NSE based on various representations and personal hearing done by the Company.</p>
3.	BSE	<p>Reg.17 of the SEBI (LODR) Regulations, 2015, requires that the Board of Directors of the top 1000 listed entities shall have at least one Independent Woman director by 1st April, 2020.</p> <p>There was noncompliance of the requirements during the period of 1st April, 2020 to 9th November, 2020.</p>	<p>The Penalty for Quarter ended 30th June, 2020 has been waived off by the BSE, whereas penalty for period from 1st July, 2020 to 9th November, 2020, has been levied by the BSE.</p>	<p>The Company has paid the penalty under protest for quarter ended 30th September, 2020 and has applied for waiver of the penalty for a period starting from 1st October, 2020 to 9th November, 2020.</p>
4.	BSE	<p>Reg.6 of the SEBI (LODR) Regulations, 2015, the Company is required to</p>	<p>The Penalty for quarter ended 30th September, 2020</p>	<p>The Company has applied for waiver of the penalty.</p>



	appoint Qualified Company Secretary as Company Secretary and Compliance Officer of the Company. Whereas there was non appointment of Company Secretary and Compliance Officer.	has been waived off by the BSE, whereas penalty for period from 1 st October, 2020 to 30 th November, 2020, has been levied by the BSE.	
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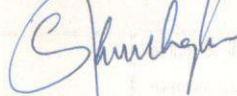
(d) The Listed Entity has taken following actions to comply with observations made in previous reports:

Sr. No.	Observations/ remarks of the Practicing Company Secretary, in previous reports	Observations made in the Secretarial Compliance Report for the year ended 31 st March, 2021	Actions taken by the Listed Entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	Reg.17 of the SEBI (LODR) Regulations, 2015, requires that the Board of Directors of the top 1000 listed entities shall have at least one Independent Woman director by 1 st April, 2020	There was noncompliance of the requirements during the period of 1 st April, 2020 to 9 th November, 2020.	The Company has appointed the Woman Independent Director on the Board with effect from 10 th November, 2020	The Company has paid the penalty under protest.
2.	Reg.6 of the SEBI (LODR) Regulations, 2015, the Company is required to appoint Qualified Company Secretary as Company Secretary and Compliance Officer of the Company	The Companies Act, 2013 provides for maximum period of 6 months to fill up the casual vacancy caused in the position of the Company Secretary and Compliance Officer. Whereas the Company has appointed new Company Secretary with	The Company has appointed Company Secretary and Compliance Officer with effect from 1 st December, 2020	The Company has paid the penalty under protest.



		effect from 1 st December, 2020, resulting into delay in appointment beyond prescribed/permissible period of 6 months.		
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**For DSM & Associates,
Company Secretaries
UCN:P2015MH038100.**



CS Sanam Umbargikar

Partner

M.No.11777.

CP No.9394.

UDIN: A026141D000415464



Date: 28th May, 2022.

Place: Mumbai.