



**PASUPATI
SPINNING
& WEAVING
MILLS LTD.**

CORP. OFFICE : 127-128, 1st FLOOR, TRIBHUVAN COMPLEX, ISHWAR NAGAR,
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E-mail : ho@pasupatitextiles.com ; admin@pasupatitextiles.com
Website : http://www.pasupatitextiles.com
CIN - L74900HR1979PLC009789

01-08-2019

The Secretary
The Stock Exchange, Mumbai,
P.J.Tower, Dalal Street,
Mumbai-400001

Sub: Annual Secretarial Compliance Report for the Financial Year ended 31st March, 2019.

Ref: Scrip Code: 503092
Scrip Id : PASUSPG

Dear Sir/Madam,

Pursuant to Regulation 24A of SEBI (LODR) Regulations, 2015 read with clause 3(b)(iii) of SEBI Circular No. CIR/CFD/CMD1/27/2019, Please find enclosed herewith Annual Secretarial Compliance Report for the financial year ended 31st March, 2019.

We would request you to kindly take on record the aforesaid information.

Thanking You

Yours Faithfully

For Pasupati Spinning & Weaving Mills Limited

ABHINAV TYAGI
COMPANY SECRETARY

**SECRETARIAL COMPLIANCE REPORT
OF
PASUPATI SPINNING AND WEAVING MILLS LIMITED FOR THE YEAR ENDED 31ST MARCH,
2019**

(Pursuant to Regulation 24A of SEBI (LODR) Regulations, 2015 vide SEBI Circular No.CIR/CFD/CMD1/27/2019)

To,
**The Board of Directors,
PASUPATI SPINNING AND WEAVING MILLS LIMITED
Village Kapriwas,
Dharuhera District,
Rewari-Haryana**

We Anand Sharma & Associates, Company Secretaries have examined:

- (a) the documents and records made available to us and explanation provided by **PASUPATI SPINNING AND WEAVING MILLS LIMITED** (CIN: L74900HR1979PLC009789)("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) all other document/ filing, as may be relevant, which have been relied upon to make this report ,for the year ended 31st March, 2019 ("Review Period") in respect of compliance with the provisions of:
 - I. the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder ; and
 - II. 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;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations,2014;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations,2008;
- (g) Securities and Exchange Board of India(Issue and Listing of Non-Convertible and Redeemable Preference Shares)Regulations,2013;



- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Other Regulations, as applicable to the Company and circulars/ guidelines issued thereunder;

and based on the examination of above, 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:-

Sr. No	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1	Filing of Compliance Certificate under regulation 7(3) LODR Regulation 2015	Non Filing of Compliance certificate U/R 7(3) LODR Regulations 2015	The Company has filed the compliance certificate after the time stipulated under the prescribed regulation for January to March Period for FY 2017-2018.
2.	As per regulation 46 of SEBI LODR, Regulations 2015, Website of the Company shall provide all information given under regulation 46(2) of SEBI LODR.	Website of the Company is not update as per regulation of 46(2) of SEBI LODR.	The Website of the Company is required to be updated.
3.	Filing of Compliance Certificate under regulation 40(10) LODR Regulation 2015	Non Filing of Compliance certificate U/R 40(10) LODR Regulations 2015	The Company has filed the compliance certificate after the time stipulated under the prescribed regulation for January to March Period for FY 2017-2018.
4.	Announcement under Regulation-30 of SEBI (LODR) Regulations, 2015	Non filing of Newspaper publication of Financial Result to stock exchange	The newspaper publication has not been filed with Stock Exchange.
5	Filing of Compliance Certificate under regulation 55A of Depositories Regulations	Delay in Filing of Compliance Certificate	The Company has filed the compliance certificate after the time stipulated under the



			prescribed regulation for January to March Period for FY 2017-2018.
6	Pursuant to Regulation 6 of LODR Regulations 2015 (Appointment of Company Secretary as Compliance Officer)	During the period under review the Company had no company Secretary for a period 26.03.2018 to 28.05.2018.	On scrutiny of relevant records it was found that there was no company secretary for the period 26.03.2018 to 28.05.2018.
7	Filing of compliance report on corporate governance under regulation 27(2) LODR Regulation 2015	Non Filing of compliance report on corporate governance under regulation 27(2) LODR Regulation 2015	The Company has filed the compliance report on corporate governance after the time stipulated under the prescribed regulation for January to March Period for FY 2017-2018.
8	Filing of Statement of Investor complaints under regulation 13(3) LODR Regulation 2015	Non Filing of Statement of Investor complaints under regulation 13(3) LODR Regulation 2015	The Company has filed the Statement of Investor complaints after the time stipulated under the prescribed regulation for January to March Period for FY 2017-2018.
9	Filing of Shareholding Pattern under regulation 31 LODR Regulation 2015	Non Filing of Shareholding Pattern under regulation 31 LODR Regulation 2015	The Company has filed the Shareholding Pattern after the time stipulated under the prescribed regulation for January to March Period for FY 2017-2018.

(b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from 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:

Sr. 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	BSE Ltd.	The Company filed the Shareholding Pattern beyond time stipulated under regulation 31 LODR Regulation 2015 for the quarter January to March Period for FY 2017-2018.	BSE Ltd. imposed penalty of Rs. 9000.	The penalty has been paid by the Company within the time given by BSE.
2	BSE Ltd	The Company filed the compliance report on corporate governance beyond time stipulated under regulation 27 LODR Regulation 2015 for the quarter January to March Period for FY 2017-2018.	BSE Ltd. imposed penalty of Rs. 14000.	The penalty has been paid by the Company within the time given by BSE.

(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 31 st March, 2019 (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
Not Applicable				



Note:

1. List of all the observations in the report for the previous year along with the actions taken by the listed entity on those observations;
2. List of all observations in the reports pertaining to the periods prior to the previous year in case the entity has not taken sufficient steps to address the concerns raised/observations;

**For Anand Sharma & Associates
Company Secretaries**



**Anand Parkash Sharma
Company Secretary
M. No. 2836
COP No. 20141**

**Date: 1st August, 2019
Place: Delhi**