

# Panyam Cements & Mineral Industries Limited

CIN No. : L26940AP1955PLC000546  
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E-mail : caohyd@panyamcements.com  
Web : www.panyamcements.com



Central Administrative Office :  
Plot No. 188, 1st Floor,  
Phase-II, Kamalapuri Colony,  
Hyderabad - 500 073. TS, INDIA.

**Date:** 16<sup>th</sup> July 2021

**The Senior General Manager,  
Department of Corporate Services,  
Bombay Stock Exchange Limited  
1<sup>st</sup> Floor, New Trading Wing,  
Rotunda Building, P.L Towers,  
Dalal Street, Mumbai-400 001.**

**Scrip Code: BSE: (500322)**

**Scrip Name: PANCM**

**Subject:** Annual Secretarial Compliance Report for the year ended 31st March 2020

Dear Sir/Madam,

Please find enclosed herewith the Annual Secretarial Compliance Report for the year ended 31st March 2020 received from Neelam Vyas & Co., Practicing Company Secretary, pursuant to Regulation 24(A) of the SEBI (LODR) Regulation, 2015 read with SEBI Circular No CIR/CFD/CMD 1/27/2019 dated 8th February 2019. You are requested to please take the information on record.

Kind Regards

Thanking you,  
Yours Faithfully,  
For **Panyam Cements and Mineral Industries Limited**



**Bhrugesh Amin**  
**In the capacity of Erstwhile Resolution Professional.**  
Implementation and Monitoring Committee Member.  
**IP Reg. No - IBBI/IPA-002/IP-N00353/2017-2018/11003.**

Regd. Office: C-1, Industrial Estate, Bommalasatram, Nandyal - 518 502, Kurnool Dist. (A.P.) India.  
Cement Works: Cementnagar - 518 206, Kurnool District (A.P.) India.

## Secretarial Compliance Report of PANYAM CEMENTS AND MINERAL INDUSTRIES LIMITED for the year ended 31st March, 2020

I, Neelam Vyas, Practising Company Secretary, have examined:

- (a) all the documents and records made available to me electronically and explanation provided by PANYAM CEMENTS AND MINERAL INDUSTRIES LIMITED (CIN: L26940AP1955PLC000546) (“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 31<sup>st</sup> March, 2020 (“Review Period”) in respect of compliance with the provisions of: -
  - a) Securities and Exchange Board of India Act, 1992 (“SEBI Act”) and the Regulations, circulars, guidelines issued thereunder; and
  - b) 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; *except for remarks as mentioned in point j (a) and j (c) below*
- (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 during the review period)***;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; - ***(Not Applicable during the review period)***;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; - ***(Not Applicable during the review period)***;
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; - ***(Not Applicable during the review period)***;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

# NEELAM VYAS & CO.



Practising Company Secretaries  
Mobile: +919322997757

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- (i) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;  
(j) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018.

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 the above Regulations and circulars/ guidelines issued there-under, 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 7 (3) – Compliance Certificate certifying maintaining physical & electronic transfer facility |            | Late filing for half year ended as on 30 <sup>th</sup> Sept, 2019.                               |
| 2.      | Regulation 13 (3) - Statement of Investor complaints   |            | Late filing for quarter ended as on 30 <sup>th</sup> June, 2019 and 31 <sup>st</sup> March, 2020 |
| 4.      | Regulation 33 - Financial Results  |            | Late filing  |
| 5.      | Reconciliation of Share Capital Audit. (SEBI- DP Reg.55A/76)   |            | Late filing for quarter ended as on 31 <sup>st</sup> March, 2020.                                |
| 6.      | Pre-Board Meeting intimation under Regulation 29(1)  |            | Late filing for quarter ended as on 31 <sup>st</sup> March, 2020.                                |
| 7.      | Post Board Meeting compliances under Regulation 33   |            | Late filing for quarter ended as on 31 <sup>st</sup> March, 2020.                                |

(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 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 the Stock Exchange (BSE Ltd) (including

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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 Practising Company Secretary, if any. |
|---------|-----------------|--|--|--|
| 1.      | BSE Ltd.        | Non-Compliance of certain Regulations of SEBI(Listing Obligations and Disclosure Requirements) Regulations, 2015 | Suspension of trading in securities of companies for non-compliances of certain Regulation of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 |  |

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

| Sr. No. | Observations of the Practising Company Secretary in the previous reports | Observations made in the secretarial compliance report for the year ended...<br><i>(The years are to be mentioned)</i> | Actions taken by the listed entity, if any | Comments of the Practising Company Secretary on the actions taken by the listed entity |
|---------|--|--|--|--|
| 1.      |  |  |  |  |

Place: Mumbai  
Date: 05/05/2021

**For NEELAM VYAS & CO.**  
Practising Company Secretaries

NEELAM  
AMIT VYAS

Digitally signed by  
NEELAM AMIT VYAS  
Date: 2021.05.05  
14:17:37 +05'30'

Neelam Vyas  
FCS: 12426 C.P. No. 3192  
UDIN: A012426C000260773