



**PASUPATI  
SPINNING  
& WEAVING  
MILLS LTD.**

CORP. OFFICE : 127-128, 1st FLOOR, TRIBHUVAN COMPLEX, ISHWAR NAGAR,  
MATHURA ROAD, NEW DELHI-110065 (INDIA) PHONE : 91-11-47632200  
E-mail : ho@pasupatitextiles.com ; admin@pasupatitextiles.com  
Website : http://www.pasupatitextiles.com  
CIN - L74900HR1979PLC009789

30-07-2020

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

**Sub: Annual Secretarial Compliance Report for the Financial Year ended 31<sup>st</sup> March, 2020.**

**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 31<sup>st</sup> March, 2020.

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 31<sup>ST</sup> MARCH,  
2020**

(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 31<sup>st</sup> March, 2020 (“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:-

<b>S r . N o</b>	<b>Compliance Requirement (Regulations/ circulars / guidelines including specific clause)</b>	<b>Deviation s</b>	<b>Observations / Remarks of the Practicing Company Secretary</b>
1	Filing of Certificate under regulation 74(5) LODR Regulation 2015	Non Filing of Certificate U/R 74(5) LODR Regulations 2015	The Company has not filed the compliance certificate after the time stipulated under the prescribed regulation for January to March Period for FY 2018-2019.
2.	Intimation of Trading Window Closure in terms of Code of Conduct for Regulating, Monitoring and Reporting of trading by insiders pursuant to SEBI (Prohibition of Insider Trading Regulation) 2015	Non Filing of Intimation of closure of Trading Window certificate U/R SEBI (Prohibition of Insider Trading Regulation) 2015	The Company has not filed the Intimation of closure of Trading Window after the time stipulated under the prescribed regulation for January to March Period for FY 2018-2019.
3.	Announcement under Regulation-30 of SEBI (LODR) Regulations, 2015	Non filing of Newspaper publication of Financial Result to stock exchange	The company has published financial results in newspaper but newspaper publication has not been filed with Stock Exchange.
4.	Filing of Certificate under regulation 74(5) LODR Regulation 2015	Non Filing of Certificate U/R 74(5) LODR Regulations	The Company has filed the Certificate after the time stipulated under

		2015	the prescribed regulation for July to September Period for FY 2019-2020.
5.	Filing of Annual Secretarial Compliance Report under regulation 24A LODR Regulation 2015.	Delay in filing of Annual Secretarial Compliance Report under regulation 24A LODR Regulation 2015.	The company has not filed the Annual Secretarial Compliance Report within the time stipulated under prescribed regulation for F.Y. 2018-2019.
6.	Filing of Annual Report (F.Y. 18-19) under regulation 34 LODR Regulation 2015.	Delay in filing of Annual Report under regulation 34 LODR Regulation.	The Company has not filed Annual Report within the time stipulated under prescribed regulation for F.Y. 2018-2019.
7.	Intimation of Trading Window Closure in terms of Code of Conduct for Regulating, Monitoring and Reporting of trading by insiders pursuant to SEBI (Prohibition of Insider Trading Regulation) 2015	Non Filing of Intimation of closure of Trading Window certificate U/R SEBI (Prohibition of Insider Trading Regulation) 2015	The Company has not filed the Intimation of closure of Trading Window after the time stipulated under the prescribed regulation for October to December Period for FY 2019-2020.
8.	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.
9.	Annual Listing Fee	The Company has not paid Annual Listing Fee	Annual Listing Fee is required to be paid by Company.

(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.	Listing Fee	SEBI has frozen the de-mat accounts of all promoters. Further SEBI has stopped the trading of security of the company.	Promoters De-mat Account has frozen due to non-payment of ALF. Company is arranging funds for the payment of the same.

(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 <sup>st</sup> 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

**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

Digitally signed by  
ANAND PARKASH  
SHARMA  
Date: 2020.07.30  
20:59:13 +05'30'

**AnandParkash Sharma  
Company Secretary  
M. No. 2836  
COP No. 20141**

**Date: 30<sup>th</sup> July, 2020  
Place: Delhi**

UDIN number F002836B000533773