

## 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 2850 4242

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

**Date: 30<sup>th</sup> June, 2021**

To,

**National Stock Exchange of India Limited,**  
Exchange Plaza, C-1, Block G,  
Bandra Kurla Complex, Bandra (East),  
Mumbai - 400 051.

**BSE Limited,**  
P. J. Towers, Dalal Street,  
Mumbai - 400 001.

Dear Sir/Madam,

**Sub: Submission of Annual Secretarial Compliance Report for the year ended March, 2021.**

**Ref: Shree Pushkar Chemicals & Fertilisers Limited**  
**(Scrip Code 539334; Security ID: SHREEPUSHK)**

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, 2021 issued by M/s. DSM & Associates, Company Secretaries.

Kindly take the same on record and acknowledge receipt.

Thanking you,

Yours Faithfully,

For **Shree Pushkar Chemicals & Fertilizers Limited**


**Nitesh Pangle**  
**Company Secretary & Compliance Officer**  
**Place : Mumbai**



Unit I : B -102/103, MIDC Lote Parshuram, Taluka Khed, Dist. Ratnagiri, Maharashtra, India.

Tel: + 91 2356 272718, 272625 • Fax: + 91 2356 272625

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[www.shreepushkar.com](http://www.shreepushkar.com)

**Secretarial Compliance Report of Shree Pushkar Chemicals and Fertilisers Limited  
for the year ended 31<sup>st</sup> March, 2021**

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

- (a) 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 31<sup>st</sup> 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 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);

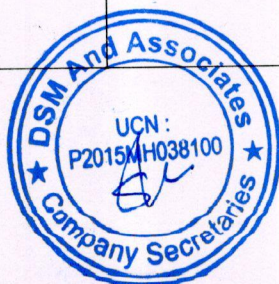


- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (not applicable to the Listed Entity during Review Period);
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 (not 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
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 <sup>st</sup> April, 2020	The Company has appointed the Woman Independent Director on the Board with effect from 10 <sup>th</sup> November, 2020	There was noncompliance of the requirements during the period of 1 <sup>st</sup> April, 2020 to 9 <sup>th</sup> November, 2020.
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	Due to resignation of previous Company Secretary, with effect from 10 <sup>th</sup> January, 2020, the Company was required to fill up the vacancy by 9 <sup>th</sup> July, 2020, whereas the same has been filled by the Company with effect from 1 <sup>st</sup> December, 2020	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 effect from 1 <sup>st</sup> December, 2020, resulting into delay in appointment beyond



			prescribed/permissible period of 6 months.
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(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:

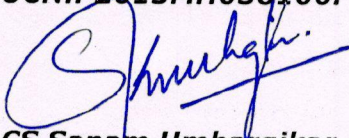
Sr. No.	Action Taken by	Details of Violation	Details of action taken e.g. fines, warning letters, debarment etc.	Observations/ remarks of the Practicing Company Secretary, if any
1.	BSE and NSE	Reg.17 - for Non Appointment of Woman Independent Director Reg.6 - for Non Appointment of Company Secretary and Compliance Officer	Penalty as prescribed under Standard Operating Procedures issued by SEBI through various circulars	The Company has already filed applications with BSE and NSE for waiver of penalty and the same are under consideration at both the stock exchanges as on the date of issue of this report.



(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 <sup>st</sup> March, 2020	Actions taken by the Listed Entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
			Nil	

**For DSM & Associates,  
Company Secretaries  
UCN:P2015MH038100.**

  
**CS Sanam Umbargikar  
Partner  
M.No.26141.**



**CP No.9394.**

**UDIN: A026141C000550896**

Date: 30<sup>th</sup> June, 2021.

Place: Mumbai.

**Note:**

Due to restricted movement and COVID-19 pandemic, we have conducted the audit by examining the Secretarial Records including Minutes, Documents, Registers and other records etc., and some of them received by way of electronic mode from the Company and could not be verified from the original records.