



PIONEER GROUP

Date : 27<sup>th</sup> May, 2019  
Ref. : BSE/15/2019-2020.

To  
BSE Limited  
Corporate Relationship Department,  
1<sup>st</sup> Floor, Routunda Building,  
PJ Towers, Dalal Street,  
Mumbai 400 001

Dear Sir,

Code : 514300  
Ref : SEBI CIRCULAR NO. CIR/CFD//CMD1/27.2019 dated 8<sup>th</sup> February, 2019  
Sub. : ANNUAL SECRETARIAL COMPLIANCE REPORT FOR THE YEAR ENDED 31<sup>ST</sup> MARCH, 2019.

Dear Sir/Madam,

In terms of Clause 3 (b)(iii) of the above referred Circular and Pursuant to Regulation 24 A of SEBI (LODR) Regulations, 2015, we are submitting the Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March, 2019 issued by Mr. Sanjay Dholakia of M/s. Sanjay Dholakia & Associates Practising Company Secretary and the Secretarial Auditor of the Company.

We request you to take the same on your records.

Thanking you,

Yours faithfully,  
For PIONEER EMBROIDERIES LIMITED

(HARSH VARDHAN BASSI)  
MANAGING DIRECTOR  
DIN 00102941  
Encl: As Above



## PIONEER EMBROIDERIES LIMITED

.... a stitch ahead of time

Corp. Off.: Unit No 21 to 25, 2nd Floor Orient House, 3-A Udyog Nagar, Off S. V. Road, Goregaon (West), Mumbai - 400062  
Tel.: 022-4223 2323 • Fax : 022-4223 2313 • E-mail : mumbai@pelhakoba.com • Website : www.pelhakoba.com

Regd. Off.: 101-B, Abhishek Premises, Plot No. C 5-6, Dalia Industrial Estate, Off New Link Road,  
Andheri (West), Mumbai - 400 058.

CIN:- L17291MH1991PLC063752

® hakoba

Embroidery beyond *your* imagination



# SANJAY DHOLAKIA & ASSOCIATES

BCOM LLB FCS

COMPANY SECRETARIES

GP 15, 2nd Floor, Raghuleela Mall, Behind Poincur Bus Depot, Kandivali (West), Mumbai - 400 067.  
☎ : 2807 3233 / 62363233 / 98700 31365 • E-mail : sanjayrd65@gmail.com

ANNEX-A

Secretarial compliance report of PIONEER EMBROIDERIES LIMITED for the year ended 31<sup>st</sup> March, 2019

I Sanjay Dholakia, Practising Company Secretary have examined:

- (a) All the documents and records made available to us and explanation provided by Pioneer Embroideries Limited ("the listed entity"),
- (b) The filings / submission made by the listed entity to the stock exchanges,
- (c) Website of the listed entity,

For the year ended ("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 Contract (Regulation) Act ,1956 ("SCRA") , rules made thereunder and the Regulation , circulars , guidelines issued thereunder by the Securities and Exchange Board of India ("SEBI Act");

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 Requirement) Regulations ,2015;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirement ) Regulations ,2018;
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (Not Applicable during the period).
- (e) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;(Not Applicable during the period).
- (f) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (g) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 And circulars / guidelines issued thereunder.

Note: The aforesaid list of SEBI regulations is only the list of Regulations which were applicable to the Company during the year under review.





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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 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
	NIL	NIL	NIL

- (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 /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.
	NIL	NIL	NIL	NIL

The listed entity has taken the following actions to comply with the observations made in previous reports: This being the First Report since the notifications issued by SEBI on 8<sup>th</sup> February, 2019, the reporting on actions to comply with the observations made in the previous year's reports do not arise.

For SANJAY DHOLAKIA & ASSOCIATES

*Dholakia Sajay*  
(SANJAY DHOLAKIA)  
Practicing Company secretary  
Proprietor  
Place: Mumbai  
Date: 27<sup>th</sup> May, 2019  
FCS 2655 CP 1798

