ANUH PHARMA LTD.
3-A, Shivsagar Estate, North Wing,
Dr. Annie Besant Road, Worli, MUMBAI - 400 018. INDIA
Tel. : 91-22-6622 7575 • Fax : 91-22-6622 7600 / 7500
E-Mail : anuh@sk1932.com • CIN: L24230MH1960PLC011586

30th July, 2020

To,
The Manager (Listing)
BSE Limited
Phiroze Jeejeebhoy Towers
Dalal Street,
Fort, Mumbai – 400001

Sub: Submission of Annual Secretarial Compliance Report for financial year ended 31/03/2020

Ref : Scrip Code No. 506260

Dear Sir,

Pursuant to the provisions of Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, we are enclosing herewith the Annual Secretarial Compliance Report for the financial year ended March 31, 2020 issued by M/s MMJB & Associates LLP, Company Secretaries.

Kindly acknowledge the receipt and take the same on record.

Thanking you,

Yours faithfully,
For **Anuh Pharma Ltd.**

A. S. Ambrale

ANUH PHARMA LTD (MUMBAI)

Ashwini Ambrale
Company Secretary & Compliance Officer
(Membership No.: A32456)

Encl: As above

MMJB & Associates LLP

Company Secretaries

Ecstasy, 803/804, 8th Floor, City of Joy, J.S.D Road, Mulund (West), Mumbai- 400080, (T) 21678100

Annual Secretarial Compliance Report of Anuh Pharma Limited
For the Financial Year ended March 31, 2020

To
The Board of Directors,
Anuh Pharma Limited
A 3, Shiv Sagar Estate
Dr. Annie Besant Road
Mumbai - 400018

We, M/s. MMJB & Associates LLP., Practicing Company Secretaries, have examined:

(a) all the documents and records made available to us and explanation provided by **Anuh Pharma 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/ filing, as may be relevant, which has been relied upon to make this certification,

for the financial year ended March 31, 2020 ("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; *(hereinafter called the "**Listing Regulations**")*
b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
c) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018

d) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
e) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; - **(Not Applicable to the Company during the Audit Period)**
f) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
g) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not Applicable to the Company during the Audit Period)**
h) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations,2013; **(Not Applicable to the Company during the Audit Period)**
i) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
j) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;

and circulars/ guidelines issued thereunder and also SEBI Circular CIR/CFD/CMD1/114/2019 dated 18/10/2019 regarding Resignation of statutory auditors from listed entities and their material subsidiaries;

and based on the above examination, 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:

Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	**Deviations**	**Observations/ Remarks of the Practicing Company Secretary**
Regulation 17(d)(1A) of Listing Regulation states that w.e.f. 1st April, 2019 "No listed entity shall appoint a person or continue the directorship of any person as a non-executive director who has attained the age of seventy five years unless a special resolution is passed to that effect, in which case the explanatory statement annexed to the notice for such motion shall indicate the justification for appointing such a person"	The shareholder approval for continuing the directorship of Directors as a non-executive director who has attained the age of seventy-five years was taken on 10th April, 2019	The Company has taken shareholder approval through Postal Ballot dated 10th April, 2019 for continuing the directorship of Mr. Jasvantlal Shah and Mr. Lalitkumar Shah who had attained the age of seventy-five years w.e.f. 1st April, 2019 However, as per the regulation the approval shall be prior to 1st April, 2019

(b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under in so far 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.
Not Applicable				

(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	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	The Company failed to comply with Regulation 17(1)(a) of Listing Regulations	The existing Director Ms. Rajeshree Gor resigned on 30th July, 2018. Later the Woman Director was not appointed within prescribed period.	The Company has appointed Ms. Mita Dixit as an Independent Woman Director w.e.f. 8th February, 2019	-
2	BSE Limited vide Circular No.: SEBI/HO/CFD/ CMD/CIR/P/2018/7 dated 3rd May, 2018	BSE Limited lived a penalty of Rs. 3,59,900/- for not complying with Regulation 17(1)(a) of Listing Regulation	Company has complied with the provisions by appointing Independent Woman Director viz. Ms. Mita Dixit w.e.f. 8th February, 2019. Also, Company has paid the penalty, under protest, of Rs. 3,59,900/-	-

For MMJB & Associates LLP.
Practicing Company Secretaries

Digitally signed by SAURABH SANJAY AGARWAL
DN: cn=SAURABH SANJAY AGARWAL, c=IN, st=Maharashtra, o=Personal, serialNumber=19a2848dcd57f711c12a829aabbdc4f42ec597b73a95f4066bf8b5bcf4adb50c
Date: 2020.07.29 17:22:16 +05'30'

Saurabh Agarwal
Designated Partner
FCS No. 9290
CP No. 20907
UDIN: F009290B000515983
Place: Mumbai
Date: 29th July, 2020