



ANUH PHARMA LTD.

Registered Office : 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

24th May, 2021

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 31/03/2021

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, 2021 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
Ashwini Ambrale
Company Secretary & Compliance Officer
(Membership No.: A32456)



Encl: As above



MMJB & Associates LLP

Company Secretaries

803-804, 8th Floor, Ecstasy, City of Joy, JSD Road, Mulund - West, Mumbai - 400080, (T) 21678100

Secretarial Compliance Report of Anuh Pharma Limited *For the Financial Year ended March 31, 2021.*

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

We, M/s Makarand M. Joshi & Co., 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, 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; (**"listing regulations"**)
- 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 Company during the Review Period)

- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not Applicable to the Company during the Review Period)**
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not Applicable to the Company 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 to the Company during the Review Period)**
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i) 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;
- j) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018

and circulars/ guidelines issued thereunder. Further, in terms of SEBI circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019 in respect of Resignation of statutory auditors from listed entities and their material subsidiaries, the listed entity has suitably modified the terms of appointment of the auditor to give effect to clause 6(A) and 6(B) of the said circular.

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
NIL		

(b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder 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	There was a delay in compliance with 17(d)(1A) of Listing Regulations.	The company has taken shareholder approval through 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.	The Company had mentioned response in Directors' Report for the year ended 31/03/2020.	-

**For MMJB & Associates LLP
Company Secretaries**

Digitally signed by SAURABH SANJAY AGARWAL
DN: cn=SAURABH SANJAY AGARWAL, o=IN,
st=Maharashtra, ou=Personal,
serialNumber=19a2845d0571711c12a829aabb0d1f
42ec597173a95f40565f8c30d4a9d50c
Date: 2021.05.21 22:38:33 +05'30'

Saurabh Agarwal
Designated Partner
 FCS No. 9290
 CP No. 20907
 Peer Review No. L2020MH006700
 UDIN: F009290C000356098
 Date: 21.05.2021