



PRITI INTERNATIONAL LIMITED

PLOT NO.F-43, BASNI IST PHASE, JODHPUR, RAJASTHAN- 342005 INDIA

CIN: L36994RJ2017PLC058454

PHONE: +91 291 2435699

E-MAIL: g.d.lohiya@gmail.com

Website: www.pritiinternationalltd.com

Ref.: PRITI / SEBILODR 24A / NSE / FY2019-20

22nd June, 2020

The Manager

National Stock Exchange of India Limited

Exchange Plaza, Plot no. C/1, G Block,

Bandra Kundra Complex

Bandra (E), Mumbai, Maharashtra - 400 151

Sub.: **Submission of Secretarial Compliance Report for the Financial Year ending on March 31st, 2020 under regulation 24A read with Circular No. CIR/CFD/CMD1/27/2019 Dated February 08, 2019.**

Dear Sirs,

Pursuant to Clause 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, Please find attached herewith the Secretarial Compliance Report for the year ended on March 31st, 2020 issued by the Secretarial Auditor CS. Reeptika Barmera.

Kindly take this on your record.

Thanking you,

Yours Faithfully

For PRITI INTERNATIONAL LIMITED

Monika Gandhi

Company Secretary and Compliance Officer



ACS REEPTIKA BARMERA

Practising Company Secretary

CP No.: 16551

M. No.: 43565

FARASO KA BUNGALOW
MOTI CHOWK JODHPUR,

RAJASTHAN-342001

Mobile: 8107427215

reaptika1@gmail.com

**SECRETARIAL COMPLIANCE REPORT
OF**

PRITI INTERNATIONAL LIMITED

For the year ended 31st March, 2020.

I have examined:

- (a) all the documents and records made available to us and explanation provided by PRITI INTERNATIONAL 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 year ended 31st March, 2020 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;





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- 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) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

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 the above Regulations and circulars/ guidelines issued thereunder,
- (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 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:





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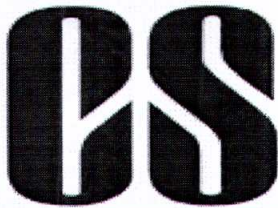
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Sr. No.	Action taken by	Details of violation	Details of action taken	Observations/ remarks of the Practicing Company Secretary, if any.
1.	National Stock Exchange (NSE)	Delay in submission of Annual Report as per Regulation 34 of SEBI (Listing Obligations & Disclosure Requirements)	NSE Levied Fine amounting to Rs. 36,000 i.e. RS. 2000 per day for non compliance of 18 days (with GST of Rs 6480) aggregating to Rs. 42,480 was imposed. However, subsequently on representation of facts of the Circumstances, said Fine was withdrawn and waived by the SEBI.	Relying upon the Compliance Calendar then updated at the NSE portal, the Company believed the due date of filing of the Annual Report to be 21 Days from the date of Annual General Meeting instead from the date of issue of Notice of AGM. Another reason was the amendment of the Regulation 34 during the present year only.

(d) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	1	2
Action taken by	National Stock Exchange (NSE)	National Stock Exchange (NSE).
Details of violation	Delay in filing of Financial Results under Regulation 33 of SEBI (Listing Obligations & Disclosure Requirements) Regulation, 2015 for the half year ended September 30, 2018 by 1 Day.	Delay in Appointment of New Compliance Officer being Company Secretary with respect to Compliance of Regulation 6(1) of SEBI (Listing Obligations & Disclosure Requirements) Regulation, 2015 by 53 Days.



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Details of action taken	NSE Levied Fine amounting to Rs. 5900 (Including GST) was imposed.	NSE Levied Fine Amounting to Rs. 62,540 (including GST) for delayed appointment of Compliance Officer for Delay of 53 Days. However, subsequently on request of the Company, said Fine was withdrawn by the SEBI.
Observations/ Remarks	It was First Compliance for the Company to submit the half yearly results. The Company has paid penalty of Rs. 5900 (Including GST) for delay of one day in filing of Financial Results.	The resignation of previous Compliance Officer was without adequate notice, therefore, it was not possible for the company to immediately recruit some other CS. The Company made appointment of Compliance Officer on 23-11-2018.

Place: Jodhpur

Date: 22-06-2020

UDIN: A043565B000364490

**Reeptika Barmera**

Practising Company Secretary

ACS No.:A43565

C P No.:16551