

**Annual Secretarial Compliance Report of Prima Agro Limited****For the year ended 31<sup>st</sup> March 2022**

I, YOGINDUNATH S, Designated Partner of BVR & Associates Company Secretaries, LLP have examined:

- (a) all the documents and records made available to us and explanation provided by Prima Agro 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 March 2022 in respect of compliance with the provisions of :

1. The Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
2. 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 (Substantial Acquisition of Shares and Takeovers) Regulations,2011;
- c) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations,2015;
- d) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993;
- e) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018; and based on the above examination, We hereby report that, during the Review Period:-



*Yogindunath S*

- (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 wherein some delay of such compliance notices as follows:

Sr.No	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1	Regulation 33 of SEBI (LODR) Regulations, 2015	A delay of 7 (seven) days in filing the Consolidated Financial Result with Regulation 33 of SEBI(LODR) Regulations 2015 for quarter ended September 30, 2021	The company has received a notice dated 19 <sup>th</sup> November 2021 showing Non-compliance with the requirement pertaining to the submission of Consolidated Financial Results for the quarter ended September 30, 2021. The Company submitted the Consolidated Financial Results on 22 <sup>nd</sup> November, 2021. In continuation to the Non-Compliance Notice Company received another notice dated 14.12.2021 showing late compliance with fine. As per company's request on 15 <sup>th</sup> December, 2021 BSE has waived the fine.



*g. n. h. a. t. s.*

- (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.
1	Levy of Fine	Late - Compliance of Regulation 33 of SEBI (LODR) Regulations, 2015.	Late compliance with Regulation 33 of SEBI (LODR) Regulations 2015 for quarter ended September 30, 2021.	The company has received a notice dated 19 <sup>th</sup> November 2021 showing Non-compliance with the requirement pertaining to the submission of Consolidated Financial Results for the quarter ended September 30, 2021. The Company submitted the Consolidated Financial Results on 22 <sup>nd</sup> November, 2021. In continuation to the Non-Compliance Notice Company received another notice dated 14.12.2021 showing



*A. Jagadnath S.*



				late compliance with fine. As per company's request on 15 <sup>th</sup> December, 2021 BSE has waived the fine.
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(d)The listed entity has received a notice on 18<sup>th</sup> January 2021 showing non-compliance with the requirement pertaining to the submission of Related Party Transactions on consolidated basis under regulation 23 (9) of SEBI(LODR) for the half year ended on 30<sup>th</sup> September, 2020 which is already mentioned in the previous report which they have regularised in this year under review.

**For BVR & ASSOCIATES COMPANY SECRETARIES LLP**

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*Yogindunath S.*

**DESIGNATED PARTNER  
YOGINDUNATH S**

**FCS No: 7865**

**CP No: 9137**

**UDIN: F007865D000398200**

**PEER REVIEW NO: P2010KE020500**

Place: Ernakulam

Date: 26.05.2022

