



# Purity Flexpack Limited

PFL/10/2022-23/VP

28<sup>th</sup> May, 2022

To,  
Department of Corporate Services,  
**BSE Limited,**  
Floor 25, P.J. Towers,  
Dalal Street,  
Mumbai-400 001

**Scrip Code: 523315**

**Sub: Submission of Annual Secretarial Compliance Report under Regulation 24A  
for the Financial Year 2021-22**

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with the SEBI Circular CIR/CFD/CMD1/27/2019 dated February 08, 2019, we are enclosing herewith the Annual Secretarial Compliance Report received from Mr. Devesh R. Desai, Practising Company Secretary for the Financial Year 2021-22.

This is for your kind information and records.

Thanking You,

Yours Faithfully

For Purity Flexpack Limited

  
Kunal Patel

Director

DIN: 00106545





**Devesh R. DESAI**  
**COMPANY SECRETARY**

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40-D, Arpita Park, Near ESI Hospital,  
Gotri Road, Vadodara-390 021.  
(M) 9879533717

Devesh R. Desai  
M.Com. LL.B. ACS  
deveshrdesai2002@rediffmail.com  
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**To,**  
**The Board of Directors,**  
**Purity Flexpack Limited,**  
**CIN No. L25200GJ1988PLC010514**  
**At & Post Vanseti, Near Baska,**  
**Halol, Panchmahal—389350, Gujarat.**

**Sub.: Annual Secretarial Compliance Report for the Financial Year 2021-2022**

**Dear Sir,**

I have been engaged by **PURITY FLEXPACK LIMITED** (hereinafter referred to as the 'Company') [CIN: (L25200GJ1988PLC010514) whose equity shares are listed on BSE Limited, to conduct an audit in terms of Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended and read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8<sup>th</sup> February, 2019 and to issue the Annual Secretarial Compliance Report thereon.

It is the responsibility of the Management of the Company to maintain records, devise proper systems to ensure compliance with the provisions of all the applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and to ensure that the systems are adequate and are operating effectively.

My responsibility is to verify compliances by the Company with provisions of all applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and issue a report thereon.

My audit was conducted in accordance with Guidance Note on Annual Secretarial Compliance Report issued by the Institute of Company Secretaries of India and in a manner which involved such examinations and verifications as considered necessary and adequate for the said purpose. Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March, 2022 is enclosed.



**Devesh R. Desai**  
**Practicing Company Secretary**  
**ACS#11332 CP#7484**  
**Place: Vadodara**  
**Date: 28<sup>th</sup> May, 2022**  
**UDIN No. A011332D000415329**  
**Peer Review Certificate No. : 2043/2022**



**Devesh R. DESAI**  
**COMPANY SECRETARY**

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**Secretarial Compliance Report of Purity Flexpack Limited**  
**for the year ended 31<sup>st</sup> March, 2022**

I Devesh R. Desai, Practicing Company Secretaries, have examined:

(a) all the documents and records made available to us and explanation provided by **Purity Flexpack Limited (CIN No. L25200GJ1988PLC010514)** (“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 31<sup>st</sup> March, 2022 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; There are no events occurred during the period which attracts provisions of these regulations, hence not applicable.

(c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; There are no events occurred during the period which attracts provisions of these regulations, hence not applicable;

(d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; There are no events occurred during the period which attracts provisions of these regulations, hence not applicable;

(e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; There are no events occurred during the period which attracts provisions of these regulations, hence not applicable;

(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; presently the Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021. There are no events occurred during the period which attracts provisions of these regulations, hence not applicable

(g) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013; presently the Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021. There are no events occurred during the period which attracts provisions of these regulations, hence not applicable

(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; and circulars/ guidelines issued thereunder (hereinafter as “Insider Trading regulations”);

(i) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulation, 2009. There are no events occurred during the period which attracts provisions of these regulations, hence not applicable

(j) Securities and Exchange Board of India (Depositories and Participants) Regulation, 2018

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:-

<b>Sr. No</b>	<b>Compliance Requirement (Regulations! circulars! guidelines including specific clause)</b>	<b>Deviations</b>	<b>Observations! Remarks of the Practicing Company Secretary</b>
1	Regulation 24A – Non-compliance with submission of secretarial	BSE Imposed Fine of Rs.	The Company had received email

	compliance report	68,440/- (for the year ended March, 2021)	dated 29th July, 2021 for Non-compliance with submission of secretarial compliance report under Regulation 24A of Listing Regulations for the Year ended 31st March, 2021. The Company has replied to the exchange stating the reasons for that as it was not non-compliance of the Company and it was the first time applicability of the Regulation for which SEBI gives time to implement the same for six months. The reply for waiver of fine is still pending from the exchange.
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(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:

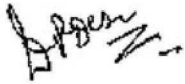
Sr. No.	Action taken by	Details of violation	Details of action taken E.g. fines, warning letter, debarment, etc.	<b>Observations!</b> remarks of the Practicing Company Secretary, if any.
1.	Regulation 24A – Non-compliance with submission of secretarial compliance report	Regulation 24A – Non-compliance with submission of secretarial compliance report	BSE Imposed Fine of Rs. 68,440/- (for the year ended March, 2021)	The Company had received email dated 29th July, 2021 for Non- compliance with submission of secretarial compliance report under Regulation 24A of Listing Regulations for the Year ended 31st March, 2021.The Company has replied to the exchange stating the reasons for that as it was not non- compliance of the Company and it was the first time applicability of the Regulation

				for which SEBI gives time to implement the same for six months. The reply for waiver of fine is still pending from the exchange.
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(d) The listed entity has taken the following actions to comply with the observations made in previous reports:

<b>Sr. No.</b>	<b>Observations of the Practicing Company Secretary in the previous reports</b>	<b>Observations made in the secretarial compliance report for the year ended on 31<sup>st</sup> March, 2021</b>	<b>Actions taken by the listed entity, if any</b>	<b>Comments of the Practicing Company Secretary on the actions taken by the listed entity</b>
1.	Regulation 17 (1) – Non-compliance with the requirements pertaining to the composition of the Board including failure to appoint woman director	Regulation 17 (1) – Non-compliance with the requirements pertaining to the composition of the Board including failure to appoint woman director	The company's letter / mail requesting waiver for fine imposed for non-Compliance of Regulation 17 (1) with proper reason to BSE through email dated 28/11/2020, 19/12/2020,	The Company's requesting for waiver of fine, the BSE withdrawn fine vide their mail dated 27 <sup>th</sup> October, 2021.

			01/03/2021 & 04/03/2021.	
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**Devesh R. Desai**  
**Practicing Company Secretary**  
**ACS#11332 CP#7484**



**Place: Vadodara**  
**Date: 28<sup>th</sup> May, 2022**  
**UDIN No. A011332D000415329**  
**Peer Review Certificate No. : 2043/2022**