

> PFL/11/2021-22/VP 14th August, 2021

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 2020-21

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 2020-21.

This is for your kind information and records.

Thanking You,

Yours Faithfully

For Purity Flexpack Limited

**Anil Patel** 

Managing Director DIN: 00006904

Enclosed a/a



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40-D, Arpita Park, Near ESI Hospital, Gotri Road, Vadodara-390 021. (M) 9879533717 (R) 2324248 Devesh R. Desai M.Com. LL.B. ACS deveshrdesai2002@rediffmail.com

## Secretarial Compliance Report of Purity Flexpack Limited for the year ended 31st March, 2021

I 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 31st March, 2021 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; 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; 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;

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:-

Sr. No	Compliance Requirement (Regulations! circulars! guidelines including specific clause)	Deviations	Observations! Remarks of the Practicing Company Secretary
		BSE Imposed Fine of Rs.	The company's letter / mail requesting waiver for fine imposed for non-compliance of
1	Regulation 17 (1) – Non-compliance with the requirements pertaining to the composition of the Board including failure to appoint woman director	1,12,100/- (for the quarter ended September, 2020)	Regulation 17 (1) with proper reason to BSE through email dated 28/11/2020, 19/12/2020,

	01/03/2021 and 04/03/2021. As on 31/03/2021, no reply was received from BSE.
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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.	Observations! remarks of the Practicing Company Secretary, if any.
		Non-compliance with	BSE Imposed Fine of Rs.	The company's letter / mail requesting waiver for fine imposed for non-ompliance of Regulation 17 (1) with proper reason to BSE through email dated
		the requirements pertaining to the composition of the	1,12,100/- (for the quarter ended	28/11/2020, 19/12/2020, 01/03/2021
		Board including failure to appoint	September, 2020)	and 04/03/2021.
1.	Regulation 17 (1)	woman director		As on

31/03/2021, no reply was received from BSE.
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(d) The listed entity has taken the following actions to comply with the observations made in previous reports:

	Observations	Observations made		
	of the	in the secretarial		Comments of the
	Practicing	compliance report		Practicing
	Company	for the year		Company
	Secretary in	endeth	Actions taken	Secretary on the
Sr.	the previous	(The years are to	by the listed	actions taken by
No.	reports	be mentioned)	entity, if any	the listed entity
		NOT APPLICABLE		

רי Devesh R. Desai

**Practicing Company Secretary** 

ACS#11332 CP#7484

Place: Vadodara

Date: 14th August, 2021

UDIN No. A011332C000784962