



**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

Date: 24<sup>th</sup> May, 2023

To,  
The Manager (Listing)  
BSE Limited  
Phiroze Jeejeebhoy Towers,  
Dalal Street, Fort, Mumbai - 400 001

**Ref: Scrip Code No. 506260**

**Sub: Submission of Annual Secretarial Compliance Report for  
Financial Year ended 31/03/2023.**

Dear Sir/Madam,

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, 2023 issued by Sanjay Doshi & Associates, Company Secretaries.

Kindly acknowledge the receipt and take the same on record.

Thanking you,

Yours faithfully,  
For **Anuh Pharma Ltd.**

**Hemant Auti**  
**Company Secretary & Compliance Officer**  
**Encl: As above**



**Secretarial Compliance Report of Anuh Pharma Limited  
for the year ended March 31, 2023**

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

We Sanjay Doshi & Associates, Practising 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 year ended March 31, 2023 (“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; [“**LODR**”]
- (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]

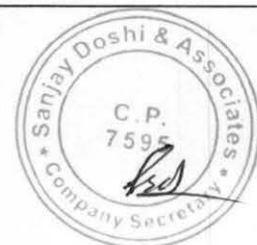
(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; ["PIT"]

(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;

Following, are the additional affirmations that have been examined:-

Sr. No	Particulars	Compliance status (Yes/No/NA)	Observations/Remarks by PCS*
1.	<u>Secretarial Standard</u>  The compliances of listed entities are in accordance with the Auditing Standards issued by ICSI, namely CSAS-1 to CSAS-3	Yes	NA
2.	<u>Adoption and timely updation of the Policies:</u> <ul style="list-style-type: none"><li>All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities.</li><li>All the policies are in conformity with SEBI Regulations and has been reviewed &amp; timely updated as per the regulations/circulars/guidelines issued by SEBI</li></ul>	Yes	NA
3.	<u>Maintenance and disclosures on Website:</u>	Yes	NA

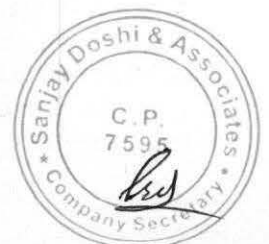


	<ul style="list-style-type: none"> <li>• The Listed entity is maintaining a functional website</li> <li>• Timely dissemination of the documents/ information under a separate section on the website</li> <li>• Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re-directs to the relevant document(s)/ section of the website</li> </ul>		
4.	<p><u>Disqualification of Director:</u></p> <p>None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013</p>	Yes	NA
5.	<p><u>To examine details related to Subsidiaries of listed entities:</u></p> <p>(a) Identification of material subsidiary companies (b) Requirements with respect to disclosure of material as well as other subsidiaries</p>	NA	There are no Subsidiaries
6.	<p><u>Preservation of Documents:</u></p> <p>The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015</p>	Yes	NA
7.	<p><u>Performance Evaluation:</u></p> <p>The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations</p>	Yes	NA
8.	<p><u>Related Party Transactions:</u></p> <p>(a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions (b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were</p>	Yes	NA



	subsequently approved/ratified/rejected by the Audit committee		
9.	<u>Disclosure of events or information:</u>  The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.	Yes	NA
10.	<u>Prohibition of Insider Trading:</u>  The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	Yes	NA
11.	<u>Actions taken by SEBI or Stock Exchange(s), if any:</u>  No Actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder	NA	NA
12.	<u>Additional Non-compliances, if any:</u>  (i) Regulation 31A(8)(c) of SEBI LODR	No	(i) Company has been delayed in filing of the disclosure to the stock exchange within 24 hours of submission of application for re-classification of status as promoter/public by the listed entity to the stock exchanges

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:-

Sr. No.	Compliance Requirement (Regulations/circulars/guidelines including)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action (Advisory/Clarification/Fine/Show Cause Notice/ Warning, etc.)
1	Disclosure to the stock exchange as soon as reasonably possible and not later than twenty four hours from the submission of application for re-classification of status as promoter/public by the listed entity to the stock exchanges	31A(8)(c) of SEBI LODR	Disclosure of submission of application for reclassification dated August 27, 2022 was delayed and Company has filed the same on November 5, 2022 and requested for condonation of delay.	Bombay Stock Exchange	Online Observation and email dated 1 <sup>st</sup> November, 2022

Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
	Nil			

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

Sr. No.	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action (Advisory/Clarification/Fine/Show Cause Notice/ Warning, etc.)
Not Applicable					





Details of Violation	Fine Amount	Observations/Remarks of the Practicing Company Secretary	Management Response	Remarks
	Not Applicable			

For Sanjay Doshi & Associates  
Company Secretary in practice

*S.R. Doshi*

Sanjaykumar Rasiklal Doshi  
C.P. No. : 7595  
FCS No: 4171  
Peer Review No.: S1996MH018400  
UDIN: F004171E000330222  
Date: May 18, 2023  
Place: Mumbai

