



**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: 27<sup>th</sup> May, 2025**

To,  
**The Manager (Listing)**  
**BSE Limited**  
Phiroze Jeejeebhoy Towers,  
Dalal Street, Fort, Mumbai - 400 001  
  
**BSE Scrip Code: 506260**

To,  
**Listing Compliance Department**  
**National Stock Exchange of India Limited**  
Exchange Plaza, Plot No. C/1, G Block,  
Bandra-Kurla Complex,  
Bandra (E), Mumbai - 400051  
**NSE Symbol: ANUHPHR; Series: EQ**

**Sub: Submission of Annual Secretarial Compliance Report for Financial Year ended 31/03/2025.**

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 31<sup>st</sup> March, 2025 issued by Pramod S. Shah & Associates, Company Secretaries.

You are requested to take the above information on record and disseminate the same on your website.

Thanking you,

Yours faithfully,

**FOR ANUH PHARMA LIMITED**

**MANAN VADHAN**  
**COMPANY SECRETARY & COMPLIANCE OFFICER**  
**Encl: As Above**



# **Pramod S. Shah & Associates**

Practising Company Secretaries

3rd Floor, LA-SHEWA Bldg., Next to Fedex, 233, P. D' Mello Road, Opp. St. George Hospital, Near CST, Mumbai - 400 001.  
Tel. : 91-22-2271 7700 / 91-22-2270 1040 • Email : saurabhshah@psaprofessionals.com • Website : cpspa.co.in

## **ANNUAL SECRETARIAL COMPLIANCE REPORT OF ANUH PHARMA LIMITED** **FOR THE YEAR ENDED 31<sup>ST</sup> MARCH, 2025**

To,  
**The Board of Directors,**  
**Anuh Pharma Limited**  
**3-A, Shivsagar Estate, North Wing,**  
**Dr. Annie Besant Road, Worli, Mumbai – 400 018**

Dear Sir/Madam,

We have conducted the review of the compliance of applicable statutory provisions and the adherence to good corporate practices by **Anuh Pharma Limited having (CIN: L24230MH1960PLC011586)** (hereinafter called "the Company") having its Registered office at 3-A, Shivsagar Estate, North Wing, Dr. Annie Besant Road, Worli, Mumbai – 400 018. Secretarial review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and to provide our observations or opinion thereon.

Based on our verification of the Company's books, papers, minute books, forms and returns filed and other records maintained by the Company and also the information provided by the Company, its officers, agents and authorized representatives during the conduct of Secretarial Review, we hereby report that the Company has, during the review period covering the financial year ended **31<sup>st</sup> March 2025** complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter:

**We, Pramod S. Shah & Associates, 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;**

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For the year ended **March 31, 2025** ("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 during the review period**];
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; [**Not applicable during the review period**];
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 [**Not applicable 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 during the review period**];
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; [**"PIT"**]
- (i) Securities and Exchange Board of India (Investor Protection and Education Fund) Regulations, 2009;

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(j) Securities and Exchange Board of India (Depository Participant) Regulations, 2018 and Circulars/guidelines issued thereunder;

(k) Other regulations and circulars / guidelines issued thereunder; as may be applicable to the Company.

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 the matters specified below:

Sr. No	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Regulation/Circular No.	Deviations	Type of Action	Details of Violation	Fine Amount	Observations/Remark of the Practising Company Secretary	Management Response	Remarks
NOT APPLICABLE									

(b) the Company has taken the following action to comply with the observations made in previous report.

Sr. No	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Regulation/Circular No.	Deviations	Type of Action	Details of Violation	Fine Amount	Observations/Remark of the Practising Company Secretary	Management Response	Remarks
NOT APPLICABLE									

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(c) We hereby report that, during the Review Period the compliance status of the listed entity is appended below;

<b><u>Sr. No</u></b>	<b><u>PARTICULARS</u></b>	<b><u>COMPLIANCE STATUS (YES/NO/NA)</u></b>	<b><u>OBSERVATIONS/REMARKS BY PRACTICING COMPANY SECRETARY</u></b>
1.	<b><u>Secretarial Standards:</u></b> The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI)	Yes	None
2.	<b><u>Adoption and timely updation of the Policies:</u></b> All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities.  All the policies are in conformity with SEBI Regulations and has been reviewed & timely updated as per the regulations/circulars/ guidelines issued by SEBI	Yes	None
3.	<b><u>Maintenance and disclosures on Website:</u></b>  The Listed entity is maintaining a functional website.  Timely dissemination of the documents/ information under a separate section on the website.	Yes	None

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	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.		
4.	<b><u>Disqualification of Director:</u></b>  None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013	Yes	None
5.	<b><u>To examine details related to Subsidiaries of listed entities:</u></b>  (a) Identification of material subsidiary companies (b) Requirements with respect to disclosure of material as well as other subsidiaries	NA	There is no material Subsidiary Company.
6.	<b><u>Preservation of Documents:</u></b>  The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of	Yes	None

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	Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.		
7.	<p><b><u>Performance Evaluation:</u></b></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	None
8.	<p><b><u>Related Party Transactions:</u></b></p> <p>(a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions</p> <p>(b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ ratified/rejected by the Audit committee</p>	Yes	None
9.	<p><b><u>Disclosure of events or information:</u></b></p> <p>The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR</p>	Yes	None

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	Regulations, 2015 within the time limits prescribed thereunder.		
10.	<p><b><u>Prohibition of Insider Trading:</u></b></p> <p>The listed entity is in compliance with Regulation 3(5) &amp; 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015</p>	Yes	None
11.	<p><b><u>Actions taken by SEBI or Stock Exchange(s), if any:</u></b></p> <p>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</p>	NA	<p><b>Observation:</b></p> <p>Bombay Stock Exchange Limited sent an email to the company regarding non-compliance with Regulation 18(1) of SEBI LODR.</p> <p><b>Management Response:</b></p> <p>In its reply dated 02<sup>nd</sup> September 2024, the company clarified that there was no non-compliance.</p> <p>Further, the company provided all relevant facts along with the applicable provisions and has submitted an online application requesting the withdrawal or waiver of the fines.</p> <p>The application is currently pending with BSE Limited.</p>
12.	<p><b><u>Resignation of statutory auditors from the listed NA No case of entity or its material</u></b></p>	NA	None

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	<p><b><u>subsidiaries:</u></b></p> <p>In case of resignation of statutory auditor from the auditor from the listed entity or any of its material subsidiaries listed entity or it's during the financial year, the listed entity and / or material subsidiary its material subsidiary(ies) has / have complied during the with paragraph 6.1 and 6.2 of section V-D chapter V of the Master Circular on compliance with the provisions of the SEBI LODR Regulations, 2015 by the listed entity.</p>		
13.	<p><b><u>Additional Non-compliances, if any:</u></b></p> <p>No additional non-compliance observed for all SEBI regulation/ circular/guidance note etc.</p>	NA	None

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## **Assumptions & Limitation of scope and Review:**

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial Records and Books of Accounts of the listed entity.
4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

**For Pramod S. Shah & Associates**

**Practicing Company Secretaries**

**ICSI Unique Code: -P2001MH010300**

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**Pramod S. Shah - Partner**

**FCS No: 334, COP No: 3804**

**PR No. 6658/2025**

**UDIN: F000334G000448441**

**Date: 27-05-2025**

**Place: Mumbai**

**Note: This report is to be read with our letter of even date which is annexed as 'ANNEXURE A' and forms an integral part of this report.**

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## ANNEXURE – A

To,  
The Members,  
**ANUH PHARMA LIMITED**  
A3 Shiv Sagar Estate,  
DR Annie Besant Road,  
Mumbai-400018

Our report of even date is to be read along with this letter.

1. Maintenance of secretarial record is the responsibility of the management of the Company. Our responsibility is to express an opinion on these records based on our verification of the same.
2. We have followed the practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of the secretarial records. We believe that the processes and practices we followed provide a reasonable basis for our opinion.
3. We have not verified the correctness and appropriateness of financial records and Books of Accounts of the Company.
4. Wherever required, we have obtained the Management representation about the compliance of SEBI laws, rules and regulations thereof.
5. The compliance of the provisions of SEBI laws, rules, regulations, regulations is the responsibility of management. Our examination was limited to the verification of compliances done by the Company.
6. As regard the books, papers, forms, reports and returns filed by the Company under the above-mentioned regulations, the adherence and compliance to the requirements of the said regulations is the responsibility of management. Our examination was limited to checking the execution and timeliness of the filing of various forms, reports, returns and documents that need to be filed by the Company with various authorities under the said regulations. We have not verified the correctness and coverage of the contents of such forms, reports, returns and documents.

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7. This report is neither an assurance as to the future viability of the Company nor of the efficacy or effectiveness with which the management has conducted the affairs of the Company.

**For Pramod S. Shah & Associates**  
**Practicing Company Secretaries**  
**ICSI Unique Code: P2001MH010300**

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**Pramod S. Shah - Partner**  
**FCS No: 334, COP No: 3804**  
**PR No. 6658/2025**  
**UDIN: F000334G000448441**

**Date: 27-05-2025**  
**Place: Mumbai**