



**SECRETARIAL COMPLIANCE REPORT**  
**OF**  
**M/s.BAFNA PHARMACEUTICALS LIMITED**  
**FOR THE FINANCIAL YEAR ENDED 31.03.2022**

We, A.K. Jain & Associates, have examined:

- a) all the documents and records made available to us and explanation provided by **M/s.BAFNA PHARMACEUTICALS 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 31.03.2022 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) The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.
- b) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- c) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;



*B. Sridhar*

- d) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;
- e) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

and circulars/ guidelines issued thereunder;

and 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
1	<i>Regulation 31 of Securities Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 – Disclosure of encumbered shares</i>	Delay in filing the disclosures under Regulation 31 of SEBI (SAST) Regulations, 2011 with respect to the invocation of encumbered shares.	The Company has belatedly submitted the disclosure regarding the invocation of encumbered shares under Regulation 31 of SEBI (SAST) Regulations, 2011, with a delay of One Hundred and Thirty Four (134) days, with the Stock Exchange.
2	<i>Regulation 30 of Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 – Disclosure of events or information</i>	Delay in submitting the outcome of Meetings of the Board of Directors under Schedule III Part A para A of SEBI (LODR) Regulations, 2015	The Company has belatedly submitted the outcome of Meetings of the Board of Directors, held to consider the financial results for the quarter ended 31.12.2021, with a delay of 1 hour 52 Minutes with the Stock Exchange.

- b) The listed entity has maintained proper records under the provisions of the above Regulations and Circulars/ Guidelines issued thereunder in so far as it appears from my examination of those records.



*D. Srinivas*

- 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
None				

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

Sr. No	Observations of the Practicing Company Secretary in the previous reports	Observations made in the Secretarial Compliance Report for the year ended.	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	Regulation 23(9) of SEBI (LODR) Regulations for the Half year ended 30 <sup>th</sup> September, 2020.  The Company belatedly submitted the Related Party Disclosure for the half year ended 30.09.2020 with a delay of Thirty Five (35) days to the Stock Exchange	31 <sup>st</sup> March 2021	The Company had belatedly submitted the Disclosure as required under Regulation 23(9) of SEBI (LODR) Regulations, 2015 for the Half year ended 30.09.2020 with a delay of Thirty Five (35) days, with the Stock Exchange.	The Company has been suggested to improve the compliance reporting mechanism in order to ensure timely compliance and filing as applicable to the company

For A.K.JAIN & ASSOCIATES  
Company Secretaries

Place: Chennai  
Date: 25.05.2022



*B. Srihar*

**BALU SRIDHAR**

Partner

FCS No. 5869

C. P. No. 3550

UDIN: F005869D000388790