

PRIMA PLASTICS LIMITED



MFGRS. OF: MOULDED FURNITURE GOVT. RECOG. EXPORT HOUSE CIN: L25206DD1993PLC001470

Corp. Office: 41, National House, Saki-Vihar Road, Powai, Andheri (E), Mumbai - 400 072. (India)

Tel.: 0091-022-2857 4768 / 69 / 1791 • **Fax**: 0091-022-2857 2859 **E-mail**: investor@primaplastics.com • **Website**: www.primaplastics.com

27th May, 2019

Listing Centre, BSE Limited, Phiroje Jeejebhoy Towers, Dalal Street, Fort, Mumbai – 400001

Scrip code - 530589

Sub: Annual Secretarial Compliance Report for the year ended March 31, 2019.

Dear Sir/Madam,

In terms of SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019 and Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended, we enclose herewith Secretarial Compliance Report of the Company for the year ended March 31, 2019, issued by Mr. Sadashiv V. Shet, Practicing Company Secretary.

You are requested to take the same on record

For Prima Plastics Limited,

Nidhi Shah

Company Secretary & Compliance officer



Regd. Office: 98/4, Prima House, Daman Industrial Estate, Kadaiya, Daman - 396 210 (U. T.) *Tel.*: 0260-222 0445 • *Fax*: 0260-222 1845

Sadashiv V. Shet

B.A., B.Com, IL.B, F.C.S Company Secretary

Address: S-15, Jaliam Complex, Nevginagar, Panaji-Goa 403001 Phone: 0832-2427847, 2421237 Email: sadashivshet@gmail.com

Secretarial Compliance Report of Prima Plastics Limited for the year ended 31st March, 2019

To, The Members, Prima Plastics Limited

I Sadashiv V Shet, Practicing Company Secretary, have examined:

- (a) all the documents and records made available to us and explanation provided by Prima Plastics 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 31st March, 2019, ("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;
- (b) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;

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- (c) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (d) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; Not Applicable to the Company during the period under review.
- (e) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; Not Applicable to the Company during the period under review.
- (f) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; Not Applicable to the Company during the period under review.
- (g) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; Not Applicable to the Company during the period under review.
- (h) 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 period under review.
- (i) Other regulations and circulars/ guidelines issued thereunder;

And based on the above examination, I hereby report that during the year under review:

(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/ Remark of the Practicing Company Secretary
	NIL	NIL	NIL

(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 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	taken E.g. fines,	Observations/ remarks of the Practicing Company Secretary, if any.
	NIL	NIL	NIL	NIL

(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 (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
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Sadashiv V Shet Practicing Company Secretary CP No: 2540

Date: 22.05.2019 Place: Panajl - Goa