

### K. P. Ghelani & Associates Company Secretaries

# SECRETARIAL COMPLIANCE REPORT

#### PARAMOUNT COSMETICS (INDIA)LIMITED FOR THE YEAR ENDED MARCH 31, 2020

I, Keyur Ghelani, Proprietor of K. P. Ghelani & Associates., Company Secretaries have examined:

- (a) all the documents and records made available to us and explanation provided by PARAMOUNT COSMETICS (INDIA) Limited ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- any other document/ filing, as may be relevant, which has been relied upon to make this certification,

For the year ended March 31, 2020 ("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 there under; and
- (b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India ("SEBI");

The specific Regulations, whose provisions and the circulars/guidelines issued there under, have been examined, include: -

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- 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
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

and circulars/ guidelines issued there under; and based on the above examination,

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## K. P. Ghelani & Associates Company Secretaries

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 there under, except in respect of matters specified below:

Sr. No.	Compliance Requirement (Regulations / Circulars / Guidelines including specific clause)	Deviations	Observations / Remarks of the Practising Company Secretary	
1	Regulation 30 Of SEBI (LODR) For Appointment of Company Secretary (KMP) And Compliance Officer	The Company has not appointed Company Secretary due to Pandemic Covid-19.	Company has not appointed Company Secretary from 10 <sup>th</sup> January, 2020 till date.	
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- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/guidelines issued there under in so far 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 there under:

Sr. No.	Action taken by	Details of Violation	Details of action taken e.g. fines, warning letters, debarment etc.	Observations / Remarks of the Practising Company Secretary, if any
		NA		



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

Sr. Observations Observations mo. of the Practising compliance rep Company for the year end Secretary in previous reports	nl taken by th rt listed d- entity, if S any t	omments of e Practising Company ecretary on the actions aken by the isted entity
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Date: July 31, 2020

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Place: Rajkot

For K. P. Ghelani & Associates Company Secretaries

NEA 7 Company Becretaria CS Keyur Ghelani

Proprietor Mem. No. 33400 C.P. No. 12468 UDIN: A033400B000538938

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Page 3 of 3 812 Star Chambers, Harihar Chowk, Rajkot – 360 001 (GUJARAT) Cell : +91 97122 74245 E-mail : cskeyurghelani@gmail.com