

# PRIME

May 24, 2019

**BSE Limited**  
Phiroze Jeejeebhoy Towers,  
Dalal Street,  
Fort, Mumbai 400001

**National Stock Exchange of India Limited**  
Exchange Plaza, 5th Floor, Plot No. C/1,  
G Block, Bandra Kurla Complex,  
Bandra (East), Mumbai 400051

Dear Sir / Madam,

**Sub: Annual Secretarial Compliance Report**

**Re: Stock Code: 500337 (BSE) / PRIMESECU (NSE)**

Pursuant to the provisions of SEBI Circular CIR/CFD/CMD1/27/2019 dated February 8, 2019, we are enclosing herewith the Annual Secretarial Compliance Report for the Year ended March 31, 2019, issued by M/s. Pramod Shah & Associates, Practising Company Secretaries.

This is for your information and records.

Thanking you,

Yours faithfully,  
For **Prime Securities Limited**

  
Ajay Shah  
Company Secretary  
(ACS-14359)



### Secretarial compliance report of Prime Securities Limited for the year ended 31<sup>st</sup> March, 2019

We have examined:

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

for the year ended 31<sup>st</sup> 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 (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- c) The Securities and Exchange Board of India (Merchant Bankers) Regulations, 1992 and amendments made from time to time;



- d) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- e) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 – Not Applicable to the Company during the Review Period;
- f) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- g) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 - Not Applicable to the Company during the Review Period;
- 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 Review Period;
- i) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- j) any 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 Company has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters specified below:-

Serial No.	Compliance Requirement (Regulations/Circulars/ Guidelines including specific clause	Deviations	Observations/ Remarks of the Practising Company Secretary
Not Applicable			

- 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 our 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



# Pramod S. Shah & Associates

Practising Company Secretaries

Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder:

Serial No.	Action taken by	Details of violation	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practising Company Secretary
Not Applicable				

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

Serial No.	Observations of the Practising 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 Practising Company Secretary on the actions taken by the listed entity
Not Applicable				

Place: Mumbai

Signature:

Date: 18/05/2019



Pramod S. Shah - Partner

M/s. Pramod S. Shah & Associates

Practising Company Secretary

FCS No.: 334

C P No.: 3804