



May 29, 2023

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: Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”)

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

Pursuant to the provisions of Regulation 24A of Listing Regulations, we are enclosing herewith the Annual Secretarial Compliance Report dated April 21, 2023, of the Company for the Year ended March 31, 2023, 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)

Prime Securities Limited

1109 / 1110, Maker Chambers V,
Nariman Point, Mumbai 400021
CIN: L67120MH1982PLC026724

www.primesec.com

Tel : +91-22-6184 2525

Fax : +91-22-2497 0777

Pramod S. Shah & Associates

Practising Company Secretaries

SR. No	COMPLIANCE REQUIREMENTS (REGULATIONS/CIRCULARS/GUIDELINES INCLUDING SPECIFIC CLAUSE)	REGULATION / CIRCULAR	DEVIATIONS	ACTION TAKEN BY	TYPE OF ACTION (ADVISORY/CLARIFICATION/FINE/SHOW/CASE USE NOTICE/ARNING,ETC)	DETAILS OF VIOLATION	FINE AN NO UN CED	OBSERVATION/ REMARKS OF THE PRACTISING COMPANY SECRETARY	MANAGEMENT RESPONSE	REMARKS
1.	Regulation 30 of SEBI (LODR) Regulations, 2015 read with Part A Schedule III	-	Intimation of the demise of Chief Financial Officer not informed to the Stock Exchange within twenty fours.	-	-	-	-	There was a delay in uploading intimation of demise of Chief Financial Officer i.e Mr. S. R. Sharma Death took place on 23.09.2022 and Stock Exchange was informed on 26.09.2022	Reporting was done on next working day.	-
2.	Regulation 17 (1) of SEBI (LODR) Regulations, 2015	-	The Composition of Board of Directors fallen below six from 1 st April, 2022 till 26 th September, 2022. (Prime Securities Limited is under Top 2000 listed Companies)	-	-	-	-	Due to resignation of Mr. Alpana Paridasha Independent Director on 31 st March, 2022 the composition was fallen below six and it was compiled on 27 th September, 2022 pursuant to appointment of 2 new Directors by	Board of Directors needed time to select suitable person for the post of Independent Director. Company has applied for waiver.	-

Pramod S. Shah & Associates

Practising Company Secretaries

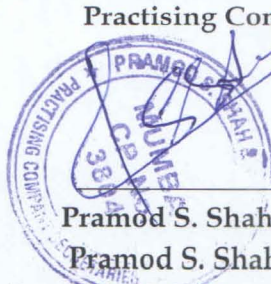
										members at AGM. The Company has applied for waiver of penalty and the application is pending with Stock Exchanges.
--	--	--	--	--	--	--	--	--	--	--

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

SR. No	COMPLIANCE REQUIREMENTS (REGULATIONS/CIRCULARS/GUIDELINES INCLUDING SPECIFIC CLAUSE)	REGULATION / CIRCULAR	DEVIATIONS	ACTION TAKEN BY	TYPE OF ACTION (ADVISORY/CLARIFICATION/SHOW/CASE USE NOTICE/ARNING, ETC)	DETAILS OF VIOLATION	FINANCE UNCED	OBSERVATION/REMARKS OF THE PRACTISING COMPANY SECRETARY	MANAGEMENT RESPONSE	REMARKS
NA										

Place: Mumbai
Date: April 21, 2023

Pramod S. Shah & Associates
Practising Company Secretaries



Pramod S. Shah-Partner
 Pramod S. Shah & Associates
 FCS No.: 334
 C P No.: 3804
 UDIN: F000334E000184892