

**SUBHASH KISHAN KANDRAPU**

Mumbai Office: CEN 957, GANESH MURTHI NAGAR, COLABA, MUMBAI – 400005,  
Hyderabad Office: Flat No. 203, 2<sup>nd</sup>Floor, Nara Paradise, Dinakar Nagar, Neredmet, Secenderabad  
– 500056, Email Id: subbok@gmail.com, subbo10@hotmail.com, Mobile: 9000607193,  
9820747385

**Annex-A**

**Secretarial compliance report of PENNAR INDUSTRIES LIMITED (CIN:  
L27109TG1975PLC001919) for the year ended 31st March 2020**

I Subhash Kishan Kandrapu have examined:

- 1) all the documents and records made available to us and explanation provided by– (“the listed entity”),
- 2) the filings/ submissions made by the listed entity to the stock exchanges,
- 3) website of the listed entity,
- 4) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31.3.2020 (“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 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) 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;  
*As on 31/03/2020, the company Buy Back and extinguish 66,15,000 Shares from its Shareholders through Open Market purchase.*  
*As on the date of this report, the Company Buy Back and extinguish 1,01,95,000 shares from its shareholders through Open Market Purchase.*
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;  
Not Applicable for the financial year 2019-2020
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; Not Applicable for the financial year 2019-2020
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; Not Applicable for the financial year 2019-2020
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

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and circulars/ guidelines issued there under;

and based on the above examination, I/We 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

(b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under insofar as it appears from my/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 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.
Not Applicable				

(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
Not Applicable				

Place: Hyderabad,  
Date: 26.05.2020

CS. Subhash Kishan Kandrapu  
ACS: 32743, CP: 17545  
UDIN: A032743B000279211