

**SECRETARIAL COMPLIANCE REPORT
FOR THE YEAR ENDED 31STMARCH 2021**

[Pursuant to Circular CIR/CFD/CMD1/27/2019 dated February 08, 2019 for the purpose of compliance with Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

To,

Pooja Entertainment and Films Limited

Pooja House, 1st Floor, CTS No. 892-893,
Juhu Tara Road, Opp. J. W. Marriott Hotel,
Juhu, Mumbai - 400049

CIN: L99999MH1986PLC040559

Authorised Capital: Rs. 30,00,00,000/-

Paid up Capital: Rs. 5,00,05,000/-

I have conducted the Secretarial Compliance Audit of the applicable SEBI (Securities and Exchange Board of India) Regulations and the circulars/ guidelines issued thereunder for the Financial Year ended 31stMarch, 2021 for Pooja Entertainment and Films Limited ("the Company"). The audit was conducted in a manner that provided me a reasonable basis for evaluating the statutory compliances and expressing my opinion thereon.

I have examined:

- (a) all the documents and records made available to us electronically and explanation provided by Pooja Entertainment and Films 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 **31stMarch 2021** ("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 (*Not applicable to the Listed Entity during the Review Period*);
- (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 *(Not applicable to the Listed Entity during the Review Period)*;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 *(Not applicable to the Listed Entity during the Review Period)*;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 *(Not applicable to the Listed Entity 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 Listed Entity during the Review Period)*;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

and circulars/ guidelines issued thereunder;

During the Review Period and based on the above examination, I hereby report that:

- (a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder,
- (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 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.
1.	BSE	Regulation 13(3) Non-submission of the statement on shareholder complaints within the period prescribed under this regulation or under any circular issued in respect of redressal of investor grievances	Fine of Rs. 1,000 per day till the date of compliance.	The company is required to furnish Quarterly Report on investor complaints within 21 days of the end of that quarter to the Exchange. It has been observed that due to covid-19 Lockdown the Company has submitted on 22nd day.

- (d) The listed entity has taken the following actions to comply with the observations made in previous reports: *(Not applicable)*

**For B. K. Pradhan & Associates
Company Secretaries**

Balkrishan Pradhan
Digitally signed by
Balkrishan Pradhan
Date: 2021.06.24
18:58:16 +05'30'

**Balkrishan Pradhan
Proprietor**

M. No.: F8879

C. P. No.: 10179

UDIN: F008879C000510479

Date: 24/06/2021

Place: Mumbai

Note: Due to COVID19 pandemic impact and lockdown, physical verification of the documents could not be done; the compliance documents were obtained through electronic mode and verified with requirements.