



**Premier  
Explosives  
Limited**

ISO 9001 REGISTERED



DNV Certification B.V., The Netherlands

June 26, 2020

To  
The General Manager  
Department of Corporate Relations  
**BSE Limited**  
Sir Phiroze Jeejeebhoy Towers,  
Dalal Street, Fort,  
Mumbai -400 001

To  
The Vice President,  
Listing Department  
**The National Stock Exchange of  
India Limited**  
Exchange Plaza  
Bandra Kurla Complex, Bandra (East)  
Mumbai 400 051

**Scrip code: 526247**

**Scrip code: 'PREMEXPLN EQ'**

Dear Sir,

**Sub: Submission of Annual Secretarial Compliance Report for the Financial  
Year 2019-20.**

**Ref: Regulation 24(A) of SEBI (LODR) Regulations, 2015.**

With reference to the captioned subject, we are herewith submitting the Annual Secretarial Compliance Report of the Company issued by Mr. K.V.Chalama Reddy, Practising Company Secretary, for the Financial Year 2019-20.

Thanking you,

Yours faithfully,  
**For Premier Explosives Ltd**

Dr. A.N. Gupta  
Chairman and Managing Director



**K. V. Chalama Reddy**

*B.Sc., LL.B., F.C.S.,*  
COMPANY SECRETARY  
M.No.: F 9268, C.P.No.5451

Plot No. 8-2-603/23/3 & 8-2-603/23, 15,  
02<sup>nd</sup> Floor, HSR Summit, Banjara Hills,  
Road No. 10, Hyderabad -500034  
Ph: 9848014503  
e-mail: kvcr133@gmail.com

To,

**The Board of Directors**

**PREMIER EXPLOSIVES LIMITED**

'Premier House', 11, Ishaq Colony, Near AOC Centre,  
Secunderabad - 500015, Telangana, India

Sir/ Madam,

**Annual Secretarial Compliance Report for the Financial Year 2019-20**

I have been engaged by **Premier Explosives Limited** (hereinafter referred to as 'the Company') bearing CIN: L24110TG1980PLC002633 whose equity shares are listed on National Stock Exchange of India Limited (NSE) (Symbol: **PREMEXPLN**) and BSE Limited (BSE) (Security Code: 526247) to conduct an audit in terms of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended read with SEBI's Circular No. CIR/CFD/CMD1/27/2019 dated 08th February, 2019 and to issue the Annual Secretarial Compliance Report thereon.

It is the responsibility of the management of the Company to maintain records, devise proper systems to ensure compliance with provisions of all applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and to ensure that the systems are adequate and are operating effectively.

Our responsibility is to verify compliances by the Company with provisions of all applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and issue a report thereon.

Our audit was conducted in accordance with Guidance Note on Annual Secretarial Compliance Report issued by the Institute of Company Secretaries of India and in a manner, which involved such examinations and verifications as considered necessary and adequate for the said purpose.

Annual Secretarial Compliance Report is enclosed.

KAMRHA  
M  
VENKATA  
CHALAMA  
REDDY

**K.V. Chalama Reddy**

Practicing Company Secretary  
FCS No: 9268, C.P.No.:5451

Date :25.06.2020

Place : Hyderabad





**K. V. Chalama Reddy**

*B.Sc., LL.B., F.C.S.,*

COMPANY SECRETARY

M.No.: F 9268, C.P.No.5451

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02<sup>nd</sup> Floor, HSR Summit, Banjara Hills,  
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Ph: 9848014503

e-mail: [kvcr133@gmail.com](mailto:kvcr133@gmail.com)

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**ANNUAL SECRETARIAL COMPLIANCE REPORT OF PREMIER EXPLOSIVES LIMITED FOR THE  
YEAR ENDED 31<sup>ST</sup> MARCH, 2020**

I, *K. V. Chalama Reddy*, Practicing Company Secretary, have examined:

- (a) all the documents and records made available to us and explanation provided by **PREMIER EXPLOSIVES 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 31<sup>st</sup> March, 2020 ("Review Period") in respect of compliance for the year ended 31<sup>st</sup> March, 2020 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 during the period under review.*
- (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 during the period under review.*
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014: *Not applicable during the period under review*
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) regulations, 2019: *Not applicable during the period under review*



- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and redeemable Preference Shares) Regulations, 2013; *Not applicable during the period under review*
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.
- (i) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009: *Not applicable during the period under review*
- (j) Securities and Exchange Board of India (Depositories and Participants) Regulations, 1996 as amended from time to time;

Based on the above examination, 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 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 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	Observations/ Remarks of the Practicing Company Secretary, if any
Nil	Nil	Nil	Nil	Nil

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

r.No	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended	Action taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	The management of the company had explained that the delay in submission was inadvertent. However, the details of the equity shares	Nil	The Company was not required to take any action, as the company had filed form C with the	Nil



allotted upon conversion of warrants were informed to the exchange on the date of allotment i.e, 25 <sup>th</sup> January, 2019 and form C was filed with the exchanges within due time for the warrants at the time of their allotment.	exchanges within the due time for the warrants at the time of their allotment.
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(e) The listed entity has complied with the points 6(A) and 6(8) as mentioned in SEBI Circular No. CIR/CFD/CMD1/114/A19 dated October 18, 2019 with regard to the Resignation of Statutory Auditors: There has been no resignation of Statutory Auditors in FY 2019-20.

KAMBHAM  
VENKATA  
CHALAMA  
REDDY

Place : Hyderabad  
Date: 25.06.2020

**K.V.Chalama Reddy**  
Practicing Company Secretary  
M No.: F 9268, C.P.No.5451

UDIN number: F009268B000382091