

SUPERTEX INDUSTRIES LIMITED

An ISO 9001:2015 Certified Company

HEAD OFFICE : BALKRISHNA KRUPA, 2ND FLOOR,
45/49, BABU GENU ROAD, PRINCESS STREET,
MUMBAI - 400 002
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EMAIL : supertex@vsnl.com • WEBSITE : www.supertex.in
CIN : L99999DN1986PLC000046



June 30, 2021

Department of Corporate Services
Bombay Stock Exchange Limited
1st Floor, P.J. Towers,
Dalal Street, Fort,
Mumbai - 400001

Scrip Code: 526133

Dear Sir,

Sub: Annual Secretarial Compliance Report

Dear Sir,

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019, please find enclosed herewith the Annual Secretarial Compliance Report for the financial year ended March 31, 2021 issued by M/s Vikas R. Chomal & Associates, Practicing Company Secretaries.

Kindly take the above on record and do the needful.

Thanking you,

Yours faithfully,

For **Supertex Industries Limited**

Sd/-

Vaishali Mungekar
Company Secretary

Encl : As above

VIKAS R CHOMAL AND ASSOCIATES

PRACTICING COMPANY SECRETARIES

A/B-201, MANAS BLDG, KHAKAR ALLEY, THANE WEST – 400601

Email: csvrca@gmail.com/vikas@vrca.co.in, Phone: 022-25410931/9867811641

SECRETARIAL COMPLIANCE REPORT OF SUPERTEX INDUSTRIES LIMITED FOR THE YEAR ENDED MARCH 31, 2021

I, Vikas R. Chomal, Practicing Company Secretary, have examined:

- (a) All the documents and records made available to me and explanation provided by Supertex Industries 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 March 31, 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 Company during the Audit period;*
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011: *Not applicable to the Company during the Audit period;*



- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018: *Not applicable to the Company during the Audit period;*
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014: *Not applicable to the Company during the Audit period;*
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008: *Not applicable to the Company during the Audit period;*
- (g) 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 Audit period;*
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) SEBI (Depositories and Participants) Regulation, 1996

and circulars/ guidelines issued thereunder;

And 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 there under, except in respect of matters specified below:-

Sr.No	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	As per SEBI's circular no. CIR/ISD/3/2011 dated 17 th June 2011 and as per Regulation 31 of SEBI (LODR) Regulation, 2015 100% of Promoter and Promoter Groups shareholding should be dematerialized.	The Promoters Shareholding of the Company is not 100% held in dematerialized form.	180 Shares of a promoter Mr. Ajay Mishra are in physical form. Since he lost his original share certificates of 180 shares.
2.	As per Regulation 33 of SEBI (Listing Obligation and Disclosure Requirement), 2015, Listed entity needs to submit Audited Financial Results for the financial year within Sixty days from the end of financial year along with the audit report. Further, SEBI vide circular no. SEBI/HO/CFD/CMD1/CIR/P/2020/3 dated March 19, 2020 has extended the due date to June 30,	In-spite of the extension given by the SEBI, the Company has submitted its Audited Financial Results for FY ending 2019-20 on 31 st August, 2020.	-During our Audit, it was shown to us that the Company vide e-mail dated 24 th July, 2020 written to the BSE Limited for extension of time for submitting audited annual financials for FY 2019-20 on or before 31 st August, 2020 for reasons as given below: 1) Due to pandemic situation prevailing in the Country and consequent continuous lockdown in Mumbai.



	<p>2020.</p> <p>Further, SEBI vide circular no. SEBI/HO/CFD/CMD1/CIR/P/2020/106 dated June 24, 2020, further extended the timeline for submission of financial results to July 31, 2020, for the year ending March 31, 2020.</p>	<p>2) There were no train services available that time and most of Company's staffs were coming by train and due to that they were unable to attend the office.</p> <p>Please note that no reply was received from BSE Limited on the request made for extension of time for submission of annual financial results.</p> <p>Further, Company received e-mail from BSE Limited dated 18th August, 2020 levying fine of Rs. 94,400/- including GST for delay in submission of annual financial at the rate of Rs.5,000/- per day till the date of their mail. In response to the fine imposed, Company had again written to the BSE Limited dated 20th August, 2020 for waiver of fine. Due to the reasons given above.</p> <p>Further, Company received a reminder e-mail dated 4th November, 2020 for payment of fine imposed.</p> <p>In response to the mail, Company written application to the BSE Limited on 6th November, 2020 explaining reasons for waiver of fine and mentioning therein the series of e-mails sent to BSE Limited for waiver of fine imposed.</p> <p>Finally, BSE Limited vide its e-mail dated 21st January, 2021 had waived of the fine imposed on the Company.</p>
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- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/guidelines issued thereunder in so far as it appears from my 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 Limited	<p>As per Regulation 33 of SEBI (Listing Obligation and Disclosure Requirement), 2015 Listed entity needs to submit Audited Financial Results for the financial year within Sixty days from the end of financial year along with the audit report.</p> <p>Further, SEBI vide circular no. SEBI/HO/CFD/CMD1/CIR/P/2020/3 dated March 19, 2020 has extended the due date to June 30, 2020.</p> <p>Further, SEBI vide circular no. SEBI/HO/CFD/CMD1/CIR/P/2020/106 dated June 24, 2020, further extended the timeline for submission of financial results to July 31, 2020, for the year ending March 31, 2020.</p> <p>In-spite of the extension given by the SEBI, the Company submitted its Audited Financials Results for FY ending 2019-20 on 31st August, 2020.</p>	<p>Fine of Rs.5,000/- per day upto the date of e-mail from BSE Limited dated 18th August, 2020.</p> <p>Total fine Rs.94,400/- including GST.</p>	<p>During our Audit, it was shown to us that the Company vide e-mail dated 24th July, 2020 written to the BSE Limited for extension of time for submitting audited annual financials for FY 2019-20 on or before 31st August, 2020 for reasons as given below:</p> <p>3) Due to pandemic situation prevailing in the Country and and consequent continuous lockdown in Mumbai.</p> <p>4) There were no train services available that time and most of Company's staffs were coming by train and due to that they were unable to attend the office.</p> <p>Please note that no reply was received from BSE Limited on the request made for extension of time for submission of annual financial results.</p> <p>Further, Company received e-mail from BSE Limited dated 18th August, 2020 levying fine of Rs. 94,400/- including GST for delay in submission of annual financial at the rate of Rs.5,000/- per day till the date of their mail. In response to the fine imposed, Company had again written to the BSE Limited dated 20th August, 2020 for waiver of fine. Due to the reasons given above.</p> <p>Further, Company received a reminder e-mail dated 4th November, 2020 for payment of fine imposed.</p> <p>In response to the mail, Company written application to the BSE Limited on 6th November,</p>



				<p>2020 explaining reasons for waiver of fine and mentioning therein the series of e-mails sent to BSE Limited for waiver of fine imposed.</p> <p>Finally, BSE Limited vide its e-mail dated 21st January, 2021 had waived of the fine imposed on the Company.</p>
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(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 31.03.2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	Total 180 Shares of a promoter Mr. Ajay Mishra are in physical form.	180 Shares of a promoter Mr. Ajay Mishra are in physical form. Since he has lost his original share certificates of 180 shares.	As explained to us by the Company, since Mr. Ajay Mishra has lost his original share certificates of 180 shares and he is unable to dematerialise the same. He is in process of obtaining duplicate share certificate for the Company.	As per SEBI's circular no. CIR/ISD/3/2011 dated 17 th June 2011 and as per Regulation 31 of SEBI (LODR) Regulation, 2015 100% of Promoter and Promoter Groups shareholding should be dematerialized form. Company is in violation of the above circular and regulation.

Date: June 30, 2021

Place: Mumbai



For Vikas R. Chomal & Associates
Company Secretaries

Vikas Chomal
Proprietor
Membership No: A24941
CP No: 12133

UDIN: A024941C000548233

FIRM PEER REVIEW NO: S2013MH216500