



## **S.S.ORGANICS LIMITED**

*We are in Quality Business*

**Date: 31<sup>st</sup> July, 2020**

**To,  
The Corporate Relations Department,  
Bombay Stock Exchange,  
PhirozeJeejeebhoy Towers,  
Dalal Street,  
Mumbai-400001.**

**Dear Sir/Madam,**

**Sub: Submission of Annual Secretarial Compliance Report for the year ended March 31, 2020**

**Scrip Code:524636**

Pursuant to SEBI Circular CIR/CFD/CM D1/27/2019 dated February 8,2019, we are submitting herewith the Annual Secretarial Compliance Report of the Company for the year ended 31<sup>st</sup> March, 2020.

This is for your information and necessary records.

Thanking you,,

**For S.S. ORGANICS LTD.**

*S. Sai Sudhakar*

**Sai SudhakarVankineni  
Managing Director  
DIN: 00733001**



*(ISO 9001 : 2008, ISO 14001:2004 & OHSAS 18001:2007 Certified Company)*

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Tel : 040-23353690, 23355938

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**SECRETARIAL COMPLIANCE REPORT**

**OF**

**S.S. ORGANICS LTD**

**FOR THE YEAR ENDED 31st MARCH, 2020**

We, P.S. Rao & Associates, Company Secretaries, have examined:

- (a) all the documents and records made available to us and explanation provided by M/s. S.S. ORGANICS LTD, having its registered office at Survey No.252/1, Aroor village, Sadasivapet Mandal, Medak District, Telangana, hereinafter referred to as **“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 31st March, 2019 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 thereunder 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 there under, 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, 2009/2018 (**Not applicable to the Company during the audit period**);
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;



- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 1998/ 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/ 2018 (**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) The Depositories Act, 1996;
- (j) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;  
and circulars/ guidelines issued there under and based on the above examination, 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.

S No	Compliance Requirement (Regulation/Circular/Guidelines including Specific Clause)	Deviations	Observations /Remarks of the Practicing Company Secretary
1	Regulation 31 of (Listing Obligation and Disclosure Requirements) Regulation, 2015	162 days delay in furnishing the Shareholding pattern for Quarter ended March, 2019	As discussed and informed by the management the company due to administrative reasons could not comply and has complied the same on 30.09.2019.
2	Regulation 31 of (Listing Obligation and Disclosure Requirements) Regulation, 2015	71 days delay in furnishing the Shareholding pattern for Quarter ended June, 2018	As discussed and informed by the management the company due to administrative reasons could not comply and has complied the same on 30.09.2019.
3	Regulation 13 of (Listing Obligation and Disclosure Requirements) Regulation, 2015	delay in furnishing the Investor Complaints is still continuing even on the date of giving this report for Quarter ended March, 2019	As discussed and informed by the management the company due to administrative reasons could not comply.
4	Regulation 13 of (Listing Obligation and Disclosure Requirements) Regulation, 2015	delay in furnishing the Investor Complaints is still continuing even on the date of giving this	As discussed and informed by the management the company due to administrative reasons could not comply.



		report for Quarter ended March, 2019	
5	Regulation 76 of SEBI (Depositories and Participants) Regulations, 2018	160 days delay in furnishing the Reconciliation Share Capital Audit for Quarter ended March, 2019	As discussed and informed by the management the company due to administrative reasons could not comply and has complied the same on 07.10.2019.
6	Regulation 76 of SEBI (Depositories and Participants) Regulations, 2018	69 days delay in furnishing the Reconciliation Share Capital Audit for Quarter ended June, 2019	As discussed and informed by the management the company due to administrative reasons could not comply and has complied the same on 07.10.2019.
7	Regulation 40(9) of (Listing Obligation and Disclosure Requirements) Regulation, 2015	delay in furnishing the Investor Complaints is still continuing even on the date of giving this report for Quarter ended March, 2019	As discussed and informed by the management the company due to administrative reasons could not comply.
8	Regulation 40(9) of (Listing Obligation and Disclosure Requirements) Regulation, 2015	delay in furnishing the Investor Complaints is still continuing even on the date of giving this report for Quarter ended March, 2019	As discussed and informed by the management the company due to administrative reasons could not comply.
9	Regulation 46 of (Listing Obligation and Disclosure Requirements) Regulation, 2015	Beyond 2 working days from the date of change in content	As discussed and informed by the management the company due to administrative reasons could not comply.
10	Regulation 6 of (Listing Obligation and Disclosure Requirements) Regulation, 2015	delay in appointment of Company Secretary from 24.10.2018 till 31.03.2020 and the delay in compliance is still continuing even on this date of giving the report	As discussed and informed by the management the company due to administrative reasons could not comply.
11	Payment of Listing Fees for the year 19-20	Delay in payment of fees after 30 <sup>th</sup> April every year.	As discussed and informed by the management the company due to administrative reasons could not comply.



- b. The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under in so far as it appears from my/our examination of those records.
- c. There were no 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 there under.

S NO	Action Taken By	Details of Violation	Details of Action taken eg; Fines Warning Letter, Debarment etc	Observations/ Remarks of the Practicing Company Secretary
1	BSE	Non-Submission of the Reconciliation Share Capital Audit for the quarter June 2019.	Notice of Non-Compliance was served,	Compliance is made good, fine is yet to be paid to BSE.
2	BSE	Non Appointment of Share Transfer Agents for the quarter June 2019.	Notice of Non-Compliance was served, requiring the company to pay a fine of Rs. 107380 (Inc GST)	Compliance is made good, fine is yet to be paid to BSE.
3	BSE	Non Appointment of qualified Company Secretary for the quarter June 2019.	Notice of Non-Compliance was served, requiring the company to pay a fine of Rs. 107380 (Inc GST)	Compliance is yet to be made good . Fine is yet to be paid to BSE.
4	BSE	Non-Submission of the Shareholding Pattern for the quarter June 2019.	Notice of Non-Compliance was served, requiring the company to pay a fine of Rs. 37,760 (Inc GST)	Compliance is made good, fine is yet to be paid to BSE.
5	BSE	Non- Submission of Statement of Investor Complaints for the quarter June 2019.	Notice of Non-Compliance was served, requiring the company to pay a fine of Rs. 18,880 (Inc GST)	Compliance is made good, fine is yet to be paid to BSE.
6	BSE	Non-Submission of the Reconciliation Share Capital Audit for the quarter March,	Notice of Non-Compliance was served,	Compliance is yet not made good and the fine is yet to be paid.





		2019.		
7	BSE	Non Appointment of Share Transfer Agents for the quarter June 2019.	Notice of Non-Compliance was served, requiring the company to pay a fine of Rs. 1,06,200 (Inc GST)	Compliance is made good, fine is yet to be paid to BSE.
8	BSE	Non payment of Fines and compliance	Suspension notice for trading in securities.  Demat Accounts of promoters and promoter group of the Company was frozen for all the debits.	The company is suspended on BSE due to non-payment of listing fees and also the penalty amounts for non compliances.

- d. The reporting of actions by the listed entity to comply with the observations made in the previous reports does not arise during the review period.

Sr. No.	Observations of the Practicing Company Secretary in the previous reports (a)	Observations made in the secretarial compliance report for the year ended... (b)	Actions taken by the listed entity, if any (c)	Comments of the Practicing Company Secretary on the actions taken by the listed entity (d)
	Compliance Requirement (Regulation/Circular/Guidelines including Specific Clause)	Observations		
<b>For the FY 2018-19</b>				
1	Regulation 31 of (Listing Obligation and Disclosure Requirements) Regulation, 2015	69 days delay in furnishing the Shareholding pattern for Quarter ended March, 2018	the observation are made which are similar to that as mentioned in Point No (a) for the compliances	As discussed and informed by the management the company due to administrative reasons could not comply and has complied the same on 29.05.2018.
				The company complied the same



2	Regulation 55A of SEBI (Depositories and Participants) Regulations, 1996	36 days delay in furnishing the Reconciliation Share Capital Audit for Quarter ended March, 2018		As discussed and informed by the management the company due to administrative reasons could not comply and has complied the same on 05.06.2018.	The company complied the same
3	Regulation 40(9) of (Listing Obligation and Disclosure Requirements) Regulation, 2015	36 days delay in furnishing the Certificate from Practicing CA/CS for Quarter ended March, 2018		As discussed and informed by the management the company due to administrative reasons could not comply and has complied the same on 05.06.2018.	The company complied the same
4	Regulation 7 (3) of (Listing Obligation and Disclosure Requirements) Regulation, 2015	36 days delay in furnishing the Certificate from RTA of the Company for Quarter ended March, 2018		As discussed and informed by the management the company due to administrative reasons could not comply and has complied the same on 05.06.2018.	The company complied the same
5	Regulation 31 of (Listing Obligation and Disclosure Requirements) Regulation, 2015	3 days delay in furnishing the Shareholding pattern for Quarter ended September, 2018		As discussed and informed by the management the company due to administrative reasons could not comply and has complied the same on 24.10.2018.	The company complied the same



6	Regulation 27(2) of (Listing Obligation and Disclosure Requirements) Regulation, 2015	5 days delay in furnishing the Corporate Governance for Quarter ended September, 2018		As discussed and informed by the management the company due to administrative reasons could not comply and has complied the same on 15.10.2018.	The company complied the same
7	Regulation 46 of (Listing Obligation and Disclosure Requirements) Regulation, 2015	Beyond 2 working days from the date of change in content		As discussed and informed by the management the company due to administrative reasons could not comply.	The company complied the same
8	Regulation 6 of (Listing Obligation and Disclosure Requirements) Regulation, 2015	delay in appointment of Company Secretary from 01.10.2018 till 05.01.2019 and appointed company secretary on 05 <sup>th</sup> January, 2019.		As discussed and informed by the management the company due to administrative reasons could not comply.	The company complied the same
9	Payment of Listing Fees for the year 2018-19	Delay in payment of fees after 30 <sup>th</sup> April every year.		As discussed and informed by the management the company due to administrative reasons could not comply.	The company is yet to comply

*N. S. Rao*





**P.S. Rao & Associates**  
Company Secretaries

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**For P S Rao & Associates  
Company Secretaries**

**Place: Hyderabad  
Date: 31.07.2020**

**N Vanitha  
Company Secretary  
M No: 26859  
C P No: 10573  
UDIN: A026859B000541505**