



**SECRETARIAL COMPLIANCE REPORT**

**OF**

**OXYGENTA PHARMACEUTICAL LIMITED**

**(FORMERLY KNOWN AS S.S. ORGANICS LTD) FOR THE YEAR ENDED 31<sup>ST</sup> MARCH, 2022**

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. Oxygenta Pharmaceutical Limited (formerly known as 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 31<sup>st</sup> March, 2022 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, 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, 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 thereunder, except in respect of matters specified below:-

S No	Compliance Requirement (Regulation/Circular/Guidelines including Specific Clause)	Deviations	Observations /Remarks of the Practicing Company Secretary
1	Regulation 23(9) of SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015	21 days delay in filing of Disclosure of Related Party Transactions for the period ended 31 <sup>st</sup> March, 2021	As discussed and informed by the management of the Company that, due to administrative reasons it could not comply and has complied the same on 21 <sup>st</sup> of August, 2021.
2	Regulation 13(3) of SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015	26 days delay in filing of Investors Complaints for the Quarter ended 30 <sup>th</sup> June, 2021	As discussed and informed by the management of the Company that, due to administrative reasons it could not comply and has complied the same on 17 <sup>th</sup> of August, 2021.

*Also it has been observed that, during the period under review the suspension against the trading in equity shares of the Company has been revoked in BSE Limited vide BSE Letter dated 09<sup>th</sup> July, 2021.*

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.

- b. 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 e.g. Fines, Warning Letter, Debarment etc.,	Observations/ Remarks of the Practicing Company Secretary
NIL				

- c. 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			
For the FY 2020-21					
1	Regulation 13(3) of SEBI (Listing and Disclosure Requirements) Regulations, 2015	4 days delay in filing of Investors Complaints for the Quarter ended 31 <sup>st</sup> March, 2020	the observation are made which are similar to that as mentioned in Point No (a) for the compliances as given under the Annual secretarial compliance report dated 30 <sup>th</sup> June, 2021 for the FY 2020-21	As discussed and informed by the management of the Company that, due to administrative reasons it could not comply and has complied the same on 25 <sup>th</sup> of June, 2020.	The company complied the same during this period under review
2	Regulation 74(5) of Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018	10 days delay in complying with submission of certificate for the quarter ended 30 <sup>th</sup> June, 2020.		As discussed and informed by the management of the Company that, due to administrative reasons it could not comply and has complied the same on 25 <sup>th</sup> of June, 2020.	The company complied the same during this period under review
3	Regulation 27 (2) of the Securities and Exchange Board of India (Listing and Disclosure Requirements) Regulations, 2015	15 days delay in complying with submission of Corporate Governance for the quarter ended 30 <sup>th</sup> September, 2020		As discussed and informed by the management of the Company that, due to administrative reasons it could not comply and has complied the same on 30 <sup>th</sup> of October, 2020.	The company complied the same during this period under review
4	Regulation 74(5) of Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018	5 days delay in complying with submission of certificate for the quarter ended 30 <sup>th</sup> September, 2020		As discussed and informed by the management of the Company that, due to administrative reasons it could not comply and has complied the same on 20 <sup>th</sup> of October, 2020.	The company complied the same during this period under review

5	Regulation 74(5) of Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018	4 days delay in complying with submission of certificate for the quarter ended 31 <sup>st</sup> December, 2020.		As discussed and informed by the management of the Company that, due to administrative reasons it could not comply and has complied the same on 19 <sup>th</sup> of January, 2021.	The company complied the same during this period under review
6	Payment of Listing Fees for the year 2020-21	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 same and the same was paid on 27-01-2021.	The company complied the same during this period under review

Place: Hyderabad  
Date: 20.05.2022

For P S Rao & Associates  
Company Secretaries

  
N. Vanitha  
Company Secretary

  
P.S. RAO & ASSOCIATES  
Hyderabad  
Company Secretaries

M No: 26859

C P No: 10573

UDIN: A026859D000354516