

June 30, 2021

To The Manager, Listing Department National Stock Exchange of India Ltd. Plot no. C/1 G Block, Bandra-Kurla Complex, Bandra (East), Mumbai-400051 Symbol: BLISSGVS	To The General Manager, Listing Department BSE Limited Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai- 400 001 Scrip Code: 506197
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Sub: Annual Secretarial Compliance Report for the year ended March 31, 2021

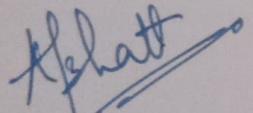
Dear Sir/Madam,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI circular no. CIR/CFD/CMD1/27/2019 dated 8<sup>th</sup> February, 2019, please find enclosed herewith Annual Secretarial Compliance Report of the Company for the financial year ended March 31, 2021.

This is for your information and record.

Thanking You,

Yours Truly,  
For Bliss GVS Pharma Limited

  
Aditi Bhatt  
Company Secretary



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Email : info@blissgvs.com • Website : www.blissgvs.com • CIN - L24230MH1984PLC034771  
Factory : Plot No. 10 & 11 Survey No. 38/1, Dewan Udyog Nagar, Aliyali Village, Tal. & Dist. Palghar - 401 404.  
Tel. (+91) (02525) 252713 • Fax : (+91) (02525) 255257. • Email : factory@blissgvs.com

# **AVS & ASSOCIATES**

## **Company Secretaries**

**Regd. Office:**S-27,Haware Fantasia Business Park, Next to Inorbit Mall, Sector 30A, Vashi, Navi  
Mumbai - 400703, Maharashtra, India

**Email:**[avsassociates16@gmail.com](mailto:avsassociates16@gmail.com)

**Tel:** 022-49785430 / 49785431 / 27810071

### **Secretarial Compliance Report of Bliss GVS Pharma Limited for the year ended March 31, 2021**

We, **AVS & Associates** have examined:

- a) All the documents and records made available to us and explanations provided by **Bliss GVS Pharma Limited ("the Listed Entity" or "the Company")**,
- b) the filings/submissions made by the listed entity to the stock exchanges i.e. **BSE limited & National Stock Exchange of India Ltd.**,
- 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 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 Company during the review period**);
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 ;
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (**Not applicable to the Company 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 Company during the review period**);

- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i) Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018;
- and circulars/guidelines issued thereunder applicable to the listed entity.

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:-

Sr. No	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1	Disclosures of Revision in Credit Ratings of the Company to the Stock Exchanges as per Regulation 30 read with Schedule III of SEBI (LODR) Regulations, 2015.	Delay in submission of credit ratings received from Informerics ratings to the Stock Exchanges	Credit Ratings received from Informerics Ratings dated October 26, 2020 and December 18, 2020 has been submitted to the stock exchanges on January 13, 2021 which was not within 24 hours from the date of revision in ratings as required under Regulation 30 read with Schedule III of SEBI (LODR) Regulations, 2015. However as informed by the Company, the said delay was occurred due to change in Credit Rating Agency.
2	Composition of Board as per Regulation 17(1) of SEBI (LODR) Regulations, 2015 as on March 31, 2021.	Non-compliance with the requirements pertaining to the composition of the Board i.e. half of the Board is not Non-Executive as on March 31, 2021.	Composition of Board of the Company is not in accordance with the regulation 17(1) of SEBI (LODR) Regulations, 2015 as on March 31, 2021.

- 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 during the review period:

Sr. No.	Action taken by	Details of violation	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Comp any Secretary, if any.
NIL				

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 31.3.2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	Special Resolution passed by the shareholders for continuation of directorship of Mr. Subramanian Ramaswamy Vaidya as Independent Director of the Company w.e.f. 27th August, 2019 instead of 1st April, 2019 who has attained the age of seventy five years pursuant to regulation 17(1A) of SEBI (LODR) 2015.	Special Resolution passed by the shareholders for continuation of directorship of Mr. Subramanian Ramaswamy Vaidya as Independent Director of the Company w.e.f. 27th August, 2019 instead of 1st April, 2019 who has attained the age of seventy five years pursuant to regulation 17(1A) of SEBI (LODR) 2015.	The Company has taken approvals of NRC & Board of the Company as per the requirement of the SEBI (LODR) Regulations, 2015. Necessary explanations are given in the Board Report of the Company for the financial year ended March 31, 2020	Actions taken by the Company is not sufficient compliance of Regulation 17(1A) of SEBI (LODR) Regulations, 2015.
2	<p>Disclosures under Regulation 7(2) of SEBI (PIT), 2015 for dealings in shares by Mr. Mangesh Wagle, Promoter has not being received during the review period but was filed subsequently suomoto by the company after the review period.</p> <p>Further, as informed by the management, the said promoter is not associated with the company since year 2006.</p>	<p>Disclosures under Regulation 7(2) of SEBI (PIT), 2015 for dealings in shares by Mr. Mangesh Wagle, Promoter has not being received during the review period but was filed subsequently suomoto by the company after the review period.</p> <p>Further, as informed by the management, the said promoter is not associated with the company since year 2006.</p>	<p>The Company has taken necessary action and as on date of issue of previous year report i.e. July 31, 2020, disclosures under Regulation 7(2) of SEBI (PIT), 2015 was filed suomoto by the Company.</p> <p>Further, the company has reclassified the shareholding of Mr. Mangesh Wagle from Promoter Category to Public Category vide stock exchanges approvals dated 14/12/2020.</p>	<p>The Company has taken necessary actions to comply with of Regulation the provisions 7(2) of SEBI (PIT), 2015.</p>

**Place: Kalyan, Thane**  
**Date: 30<sup>th</sup> June, 2021**

**For AVS & Associates**  
**Company Secretaries**

**Vijay Yadav**  
**Partner**  
**Membership No: A39251**  
**CP No: 16806**  
**UDIN: A039251C000550432**

**Note: Due to lockdown in the state because of COVID-19, we were not able to personally visit at the office of the company for verification of documents physically and hence obtained all the documents, details, information in electronic mode and taken necessary explanations, clarifications and representations either telephonically or electronically whenever required.**