

**July 31, 2020**

**BSE Limited**

25<sup>th</sup> Floor, P J Towers,  
Dalal Street, Fort,  
Mumbai - 400 001  
Scrip Code: 531637

Dear Sir,

**Sub. : Compliance under Regulation 24(A) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015**

In terms of Regulation 24(A) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, we enclose Secretarial Compliance Report duly issued by Mr. Anand Lavingia, Practising Company Secretary, for the financial year ended March 31, 2020.

You are requested to take the same on your record.

Thanking You,

Yours Faithfully,

**For Praveg Communications (India) Limited**

*(Formerly known as Sword and Shield Pharma Limited)*



**Mukesh Chaudhary**  
Company Secretary &  
Compliance Officer



Encl. : As Above

**PRAVEG COMMUNICATIONS (INDIA) LIMITED**

*(Formerly Sword and Shield Pharma Limited in which Praveg Communications Limited has amalgamated)*

Regd. Office: 101 & 102, First Floor, Shanti Arcade, 132' Ring Road, Naranpura, Ahmedabad - 380013

CIN: L24231GJ1995PLC024809 | Phone: +91 79 27496737, 27494266 | Email: info@praveg.com | Website: www.praveg.com

Ahmedabad | New Delhi | Mumbai | New Jersey | Atlanta | Sydney



## ANNUAL SECRETARIAL COMPLIANCE REPORT

### SECRETARIAL COMPLIANCE REPORT OF PRAVEG COMMUNICATIONS (INDIA) LIMITED

(Formerly known as Sword & Shield Pharma Limited)

for the year ended on March 31, 2020

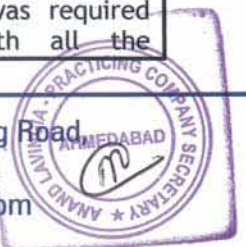
I, Anand Sureshbhai Lavingia, Practicing Company Secretary, have examined:

- (a) all the documents and records made available to us and explanation provided by Praveg Communications (India) Limited (formerly known as Sword & Shield Pharma Limited) ("the Company" or "the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity and
- (d) all other document/ filing, as may be relevant, which has been relied upon to make this certification, for the year ended on March 31, 2020 ("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");
  - (c) The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include;
    - i. Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
    - ii. Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
    - iii. Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
    - iv. Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
    - v. Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
    - vi. circulars/ guidelines/Amendments 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 thereunder to the extent applicable and in the manner prescribed, 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.      | The Company shall include 1) the applicable  | The Company has not included 1) the applicable information | The Company was required to comply with all the           |





# Anand Lavingia

ACS, LL.M, LL.B(Spl.), B.Com.

Practicing Company Secretary

| Sr. No. | Compliance Requirement (Regulations/ circulars / guidelines including specific clause)   | Deviations   | Observations/ Remarks of the Practicing Company Secretary  |
|---------|--|--|--|
|         | information pertaining to the unlisted entity/ies involved in the scheme in the format specified for abridged prospectus as provided in Part D of Schedule VIII of the ICDR Regulations, 2009 (Part E of Schedule VI of SEBI (ICDR) Regulations, 2018), 2) The Complaint report as per Annexure III of SEBI Circular and 3) Pre and Post-arrangement or amalgamation, expected capital structure and shareholding pattern, in the explanatory statement or notice or proposal accompanying resolution to be passed sent to the shareholders while seeking approval of the scheme in accordance with SEBI Circular No. CFD/DIL3/CIR/2017/21 dated March 10, 2017 and BSE Observation Letter No. DCS/AMAL/AJ/R37/1119/2018-19 dated May 5, 2018. | pertaining to the unlisted entity - Praveg Communications Limited involved in the scheme in the format specified for abridged prospectus as provided in Part D of Schedule VIII of the ICDR Regulations, 2009 (Part E of Schedule VI of SEBI (ICDR) Regulations, 2018); 2) The Complaint report as per Annexure III of SEBI Circular and 3) Pre and Post-arrangement or amalgamation, expected capital structure and shareholding pattern, in the explanatory statement, accompanying resolution to be passed, sent to the shareholders while seeking approval of the scheme in accordance with SEBI Circular No. CFD/DIL3/CIR/2017/21 dated March 10, 2017 and BSE Observation Letter No. DCS/AMAL/AJ/R37/1119/2018-19 dated May 5, 2018. | Disclosures / compliance requirement specified in SEBI Circular No. CFD/DIL3/CIR/2017/21 dated March 10, 2017 and BSE Observation Letter No. DCS/AMAL/AJ/R37/1119/2018-19 dated May 5, 2018.<br><br>As per information provided by the Management of the Company, the Company is in continuous touch with the BSE Limited for the said non-compliance. |

- (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 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.      | Nil             | Nil                  | Nil   | Nil  |

Office No. 415-416, 4th Floor, Pushpam Complex, Opp. Seema Hall, 100 Feet Ring Road, Satellite, Ahmedabad-380 051. Gujarat, India

O/Fax : 079-40051702 M.: 91 94270 49481 Email : krishvadvorsy@gmail.com





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Practicing Company Secretary

(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* | Actions taken by the listed entity, if any | Comments of the Practicing Company Secretary on the actions taken by the listed entity |
|---------|--|--|--|--|
| 1.      | Nil  | Nil  | Nil  | Nil  |

\* This being first Annual Secretarial Compliance Report, no observation were supposed to be made for the previous report.

I further report that, during the review period, following regulations issued by the Securities and Exchange Board of India were not applicable to the Company, since there were no such instances occurred during the review period that requires the compliance under the said regulations;

- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
- Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009
- Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 and
- and circulars/ guidelines/Amendments issued thereunder.

Signature: 

Anand Sureshbhai Lavingia  
Practicing Company Secretary

ACS No.: 26458 C P No.: 11410

UDIN: A026498 B000538024



Place: Ahmedabad

Date: July 31, 2020