

SKP & CO.
Company Secretaries

**ANNUAL SECRETARIAL
COMPLIANCE REPORT**

Globus Spirits Limited
F.Y. 2021-2022

SECRETARIAL COMPLIANCE REPORT

Globus Spirits Limited.

for the year ended on March 31, 2022

We have examined:

- a) All the documents and records made available to us and explanation provided by Globus Spirits Limited ("the listed entity"),
- b) The filings/ submissions made by the listed entity to the stock exchanges.
- c) Website of the listed entity,
- d) Other relevant documents and filing

For the year ended on March 31, 2022("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 there under; and
- b) The Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made there under 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, 2018.
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2018;
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2018;
- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations , 2013;
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations , 2015
- i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 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, 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
NIL			

- 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 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 there under:

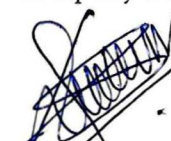
Sr.No	Actions Taken by	Details of Violation	Details of Action Taken E.g. fines, warning letter, debarment etc..	Observations/Remarks of the Practicing Company Secretary
NIL				



d) The Listed entity has taken the following actions to comply with the observation 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 on March 31, 2021	Actions taken by Listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the Listed entity
1.	Nil	The Company did not have a formally appointed Independent woman director on the Board of the Company till August 23, 2020.	Formal appointment of Ms. Ruchika Bansal as an Independent Director was made in the Board Meeting held on August 24, 2020.	The Company has Ms. Ruchika Bansal who satisfies criterion of an Independent Director on the Board of Directors of the Company since 28.03.2015. However, her formal appointment as an Independent Director was made in the Board Meeting held on August 24, 2020. The Company fell in the list of top 1000 listed entities as on March 31, 2020.

For **SKP & Co.**
Company Secretaries



(CS Sundeep Kumar Parashar)

M. No. : F6136,

C.P. No : 6575

PR : 1323/2021

UDIN : F006136D000412949

Place : Vaishali

Date : 27.05.2022

