

# Anant Gude & Associates

B.Com., LL.B., ACS

COMPANY SECRETARIES

6, Jay Kiran Liberty Garden,  
Malad (West), Mumbai - 400 064

Mobile No.: 99300 53007  
e-mail: gudeanant@gmail.com

**ANNUAL SECRETARIAL COMPLIANCE REPORT OF  
PRAXIS HOME RETAIL LIMITED  
FOR THE YEAR ENDED MARCH 31, 2021**

I, **Anant Gude**, proprietor of **M/s. Anant Gude & Associates**, Practicing Company Secretary have examined:

- (a) All the documents and records made available to me in digital mode and explanations provided by Praxis Home Retail 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 documents/ filings 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) Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the regulations, circulars, guidelines issued thereunder; and
  - (b) 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:**

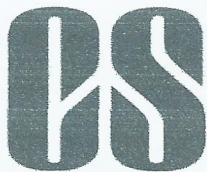
- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (e) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (f) Securities and Exchange Board of India (Prohibition of Fraudulent and Unfair Trade Practices relating to Securities Market) (Amendment) Regulations, 2018;
- (g) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018; and circulars / guidelines issued thereunder.

**And based on the above examination, explanations and presentations provided by the Company, I hereby report that, during the Review Period:**

- (a) The listed entity has complied with the provisions of the above regulations/ circulars/ guidelines issued thereunder, **except** in respect of matters specified below:







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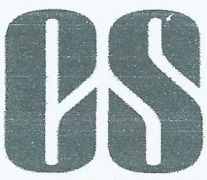
Sr. No.	Compliance Requirement (Regulations/ Circulars/ Guidelines including Specific Clause)	Deviations	Observations /Remarks of the Practicing Company Secretary
1	Regulation 30 of SEBI (Listing Obligations and Disclosure Requirement) Regulations, 2015	<p><b><u>Intimation u/r. 30 filed by the Company on March 01, 2021 to the stock exchange(s) has been filed in delay</u></b></p> <p>Disclosure filed with respect to the Company petition filed under Section 9 of Insolvency and Bankruptcy Code, 2016 ("IBC") by M/s. Profile Interiors, Operational Creditor of the Company, in which Hon'ble National Company Law Tribunal - Mumbai Bench IV ("NCLT, Mumbai") had passed an order dated 4<sup>th</sup> August, 2020 ("Order"), admitting the said petition and appointing Interim Resolution Professional (IRP). Immediately upon knowledge of the said Order and before initiation of Corporate Insolvency Resolution Process (CIRP), the Company's Promoter - Future Corporate Resources Private Limited entered into a settlement agreement for payment of Rs. 45,00,000/- (Rupees Forty-Five Lakhs only) with the said operational creditor and submitted an interlocutory application with NCLT on 7<sup>th</sup> August, 2020, making prayer for closure of the process initiated pursuant to the order dated 4<sup>th</sup> August, 2020 and discharging IRP from duties re-instating the management operations, which was completed on 19<sup>th</sup> August 2020. In this matter, since Corporate Insolvency Resolution Process ("CIRP") was not initiated and settlement was arrived before the initiation of the CIRP process, <i>the management initially was of the opinion that no disclosure was required, However, based on the legal advice received at a later date, immediately the delayed disclosure was made to the stock exchanges.</i></p>	The disclosure required was filed to the stock exchanges in delay.

(b) The listed entity has maintained proper records under the provisions of the above regulations/ circulars/ guidelines issued thereunder in so far 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 by SEBI or by Stock Exchanges: (including under the standard operating procedures issued by SEBI through various circulars under the aforesaid Act/ Regulations and Circulars/ Guidelines issued thereunder:







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Sr. No.	Action Taken By	Details of Violations	Details of Action Taken e.g. Fines, Warning Letters, Debarment etc.	Observations / Remarks of the Practicing Company Secretary
--	Nil	Nil	Nil	Nil

The listed entity has taken the following actions to comply with the observations made in previous reports: **Not Applicable** since there was no observation in the previous report i.e. for FY 2019-20.

I have to report that due to prevailing conditions of **COVID-19** Pandemic in the country, I could not carry out the physical inspection of the records maintained by the Company. I have relied upon the records in digital mode as made available by the Company and on the Management Representation Letter issued by the Company.

The listed entity has taken the following actions to comply with the observations made in the previous reports: **NOT APPLICABLE**, since there was no observation in the previous report i.e. for FY: 2019-20.

M/s. ANANT GUDE & ASSOCIATES

ANANT GUDE  
Practicing Company Secretary  
Proprietor  
ACS No.: 7219  
PCS No.: 18623



Place: Goa  
Dated: May 06, 2021

UDIN: A007219C000213227