

Positive Electronics Ltd.

Bolai Kutir, 23A/1B, Justice Dwarkanath Road, Bhowanipure, Kolkata – 700020

Email id: info.positive@gmail.com, Website: www.positiveelectronics.in

CIN: L67120WB1981PLC033990, Phone: +91 9748691796

Date: 01.07.2021

To,
The Bombay Stock Exchange
Department of Corporate Services,
25th Floor, P. J. Tower,
Dalal Street, Fort,
Mumbai – 400 001

To,
The Calcutta Stock Exchange Limited
7, Lyons Range,
Kolkata – 700 001

Ref: BSE Scrip Code: 539178/ CSE Scrip Code: 026116

Sub: Submission of Secretarial Compliance Report under Reg. 24A of SEBI (LODR) Regulations, 2015

Dear Sir/Madam,

In compliance with Regulation 24A of SEBI (LODR) Regulations, 2015 with the stock exchange, please find attached herewith the Secretarial Compliance Report from Bharti Mundhra, Practicing Company Secretary for the year ended on 31st March, 2021.

Kindly acknowledge the same.

Thanking you,
For, Positive Electronics Limited

Rahul Kumar Lodha
Rahul Kumar Lodha
(Company Secretary)



Secretarial compliance report of M/s Positive Electronics Limited for the year ended 31st March, 2021

I, Bharti Mundhra have examined:

- a) all the documents and records made available to us and explanation provided by M/s Positive Electronics Limited ("the listed entity"),
 - b) the filings/ submissions made by the listed entity to the stock exchanges,
 - c) any other document/ filing, as may be relevant, which has been relied upon to make this certification,
- for the year ended 31st March, 2021 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; **No Issue of any security during the year**
- c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; **No instances were reported during the year.**
- d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **No instances were reported during the year.**
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **No instances were reported during the year.**
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **No instances were reported during the year.**
- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **No such instances reported during the year**
- h) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; **No such instances reported during the year**



- i) The Securities and Exchange Board of India (Employee Stock Option Scheme and Employee Stock Purchase Scheme) Guidelines, 1999; **No such instances reported during the year**
- 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.
- k) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009. **No Delisting was done during the year**
- l) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 1998. **No buy – back was done during the year.**
and circulars/ guidelines issued thereunder;

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 Professional
NA			

- b) The listed entity has maintained

Sr. No.	Compliance Requirement (Regulations/Circulars/ Guidelines including specific clause)	Deviations	Observations/Remarks of the Practicing Professional
NA			

