

Universus Photo Imagings Limited

(Formally known as JINDAL PHOTO IMAGING LIMITED)

CIN: U22222UP2011PLC103611

Corp. Off.: Plot No. 12 , Sector-B-1, Local Shopping Complex , Vasant Kunj, New Delhi-110070.

Tel: 91-11-40322100 Fax: 91-11-40322129

Website: www.universusphotoimagings.com

UPIL/DE-PT/SE/2020-21

Date: 24th June, 2020.

The Manager, Listing
National Stock Exchange of India Ltd.
Exchange Plaza,
Bandra-Kurla Complex
Bandra (E)
MUMBAI - 400 051
Scrip Code: NSE: UNIVPHOTO

The Manager Listing
BSE Limited.
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
MUMBAI – 400 001
Scrip Code: **BSE: 542933**

Sub: Annual Secretarial Compliance Report for the financial year ended on March 31, 2020.

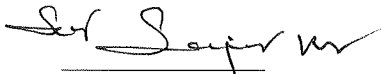
Dear Sir/Madam,

Please find enclosed herewith the Annual Secretarial Compliance Report for the financial year ended on March 31, 2020 as per Regulation 24A read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated, February 8, 2019.

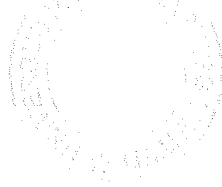
Request you to kindly take the same on records.

Thanking You,

Thanking You,
Yours Truly,
For **Universus Photo Imagings Ltd.**



Shailendra Sinha
Whole-time Director
DIN: 08649186





SECRETARIAL COMPLIANCE REPORT OF UNIVERSUS PHOTOIMAGING LIMITED FOR THE YEAR ENDED MARCH 31, 2020

We have examined:

- a) all the documents and records made available to us and explanation provided by **UNIVERSUS PHOTO IMAGING LIMITED CIN: U22222UP2011PLC103611(Formerly know as Jindal Photo Imaging Limited)** ("the *listed entity"-hereinafter called "the Company") having its Registered Office at 19th km Hapur, Bulandshar Road, P.O. Gulaothi, Distt. Bulandshahr U.P.-245 408 ;
- b) the filings/ submissions made by the company to the stock exchanges;
- c) website of the company;
- d) any other document/ filing, as may be relevant, which has been relied upon to make this certification, for the period starting from the date of admission of Listing of Equity shares i.e. February 14, 2020 to March31, 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");

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 Disclosures 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) The Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 **(Not applicable to the Company during the Review Period)**
- (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 Participants) Regulations, 2018 and circulars/ guidelines issued thereunder;

and based on the above examination, we hereby report that, during the Review Period:

- a) The Company has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder.



- b) The Company 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 company/ 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.
--NIL--				

- d) The Company 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... (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the company
Not Applicable**				

*Note: The equity shares of the company were admitted for listing on BSE Limited and National Stock Exchanges Limited with effect from February 14, 2020.

**This being the first year of submission of this Report, therefore observation of previous years not applicable.

- e) Since the Auditor has already been appointed, terms of appointment of Statutory Auditor have been suitably modified to give effect to 6(A) and 6(B) of SEBI Circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019.



FOR DMK ASSOCIATES
COMPANY SECRETARIES



(DEEPAK KUKREJA)
PRACTICING COMPANY SECRETARY
PARTNER
FCSNO.:4140
C P NO.:8265
UDIN: F004140B000377141
JUNE 24, 2020
NEW DELHI

