

# Alka India Ltd.

Unit No. 102, 1st Floor, Morya Landmark II, New Link Road,  
Near Infinity Mall, Andheri West, Mumbai - 400 053.  
Ph: 022 - 4972 0369 E-mail ID: alkaindia@gmail.com  
www.alkaindia.in CIN No.: L99999MH1993PLC168521

AIL/BSE08/2019-20

29<sup>th</sup> May, 2019

To,  
The Corporate Relation Department,  
BSE Limited,  
P.J. Tower, Dalal Street,  
Fort, Mumbai - 400 001.

Scrip Code: 530889

**Sub: Annual Secretarial Compliance Report for the year ended March 31, 2019**  
**Ref: Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements)**  
**(Amendment) Regulations, 2018**

Dear Sir/Madam,

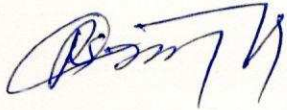
Pursuant to Regulation 24A of the SEBI - (Listing Obligations and Disclosure Requirements) (Amendment) Regulations, 2018, please find enclosed the Annual Secretarial Compliance Report for the year ended March 31, 2019.

Kindly take the above information on your records and oblige.

Thanking You,

Yours Faithfully,

For Alka India Limited



**Ramakant Sharma**  
Director  
DIN: 03636385  
Enclosed: a/a



*Marching Ahead for A Better Tomorrow*



**SECRETARIAL COMPLIANCE REPORT OF M/S. ALKA INDIA LIMITED  
FOR THE YEAR ENDED 31<sup>ST</sup> MARCH, 2019**

To,  
The Board of Directors,  
Alka India Limited

I, Mr. Rahul Gupta, Company Secretary in Practice, Proprietor of M/s. B R Gupta & Co. have examined:

- (a) all the documents and records made available to us and explanation provided by Alka India Limited ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31<sup>st</sup> March, 2019 ("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 Disclosure Requirements) Regulations, 2015;
- (b) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (c) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- (d) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (e) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (f) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; - **Not Applicable during the Review Period.**
- (g) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; - **Not Applicable during the Review Period.**



(h) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; - **Not Applicable during the Review Period.**

(i) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013;

and circulars/guidelines 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, 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.	SEBI Circular CIR/MRD/DP/10/2015 dated June 05, 2015	The Difference between Equity Shares with the BSE Ltd. (Exchange) and Equity Shares as per Sharex Dynamic (India) Pvt. Ltd. (RTA) is due to 25,00,00,000 Equity Shares issued upon conversion of 25,00,000 Non-Cumulative 6% Preference Shares of Rs. 100/- pending for Listing.	The Company had filed Application for Listing the same has already been made with the BSE Ltd. (Exchange) and is under process.

(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.	SEBI	SEBI vide its order no. EAD/BJD/NJMR/2/2017-18 with regards to redressal of investor grievances through SEBI Complaints Redress System (SCORES).	Rs.25,00,000/-	The Company had filed appeal before the SAT and the matter is sub judice.



(d) The listed entity has taken the following actions to comply with the observations made in previous reports: (not applicable as this the first year of reporting)

Sr. No.	Observations of the Practising 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 Practising Company Secretary on the actions taken by the listed entity
The Secretarial Compliance Report was introduced by the SEBI vide Circular No. CIR/CFD/CMD1/27/2019 dated 8 <sup>th</sup> February 2019 from the financial year 2018-19. Accordingly, this being the first financial year of applicability of this Report, the previous year's comparative information is not available. Hence, this information is not provided.				

\* Company name in the list of shell companies (Vide SEBI on its letter bearing no. SEBI/HO/ISD/OW/P/2017/18183 dated August 7, 2017). Exchange ("BSE") had initiated a process of verifying the credentials / fundamentals of the company. Exchange had appointed an auditor to conduct audit of the company to verify its credentials/fundamentals.

On verification, if Exchanges do not find appropriate credentials / fundamentals about existence of the company, Exchanges may initiate the proceeding for compulsory delisting against the company, and the said company shall not be permitted to deal in any security on exchange platform and its holding in any depository account shall be frozen till such delisting process is completed.

Place: Mumbai  
Date: 29.05.2019



For B R Gupta & Co.  
Practising Company Secretary  
M. No.: 43021  
C.P. No.: 20863

*R. Gupta*

CS Rahul Gupta