



B R Gupta & Co. Company Secretaries

Office Add.: Unit No. 12, 1st Floor, Poonam Cluster 2, Shanti Park Layout,
Miraroad (E), Thane – 401 107, Maharashtra, India.
Email Id: cs.guptarahul@gmail.com | **Cont. No.:** +91 – 816 919 2320

ANNUAL SECRETARIAL COMPLIANCE REPORT OF M/S. ALKA INDIA LIMITED FOR THE YEAR ENDED 31ST MARCH, 2021

To,
The Board of Directors,
Alka India Limited,
CIN: L99999MH1993PLC168521

I, 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 31st March, 2021 ("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 (Share Based Employee Benefits) Regulations, 2014:- **Not Applicable during the Review Period**
- (f) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;- **Not Applicable during the Review Period**
- (g) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;- **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;- **Not Applicable during the Review Period**
- (j) And such other circulars/guidelines issued and applicable to the Company thereunder.

And based on the above examination, I hereby report that, during the Review Period;

- (a) The listed entity has complied with the applicable provisions of the above Regulations and 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 27(2) of SEBI (LODR) Regulations, 2015, Corporate Governance	-	Delayed submission was done by the Company.
2.	Regulation 13(3) of SEBI (LODR) Regulations, 2015, Investor Complaints	-	Delayed submission was done by the Company.
3.	Regulation 31 of SEBI (LODR) Regulations, 2015, Shareholding Pattern	-	Delayed submission was done by the Company.

(b) The listed entity has maintained proper records under the provisions of the above Regulations and 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 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.	BSE	Shell Company	SCN	The matter was sub judice.

(d) The listed entity 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 31 st March, 2020 (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 listed entity
			None	

For B R Gupta & Co.
Practicing Company Secretary

Rahul Gupta
Company Secretary

M. No.: 43021 & **COP No.:** 20863

UDIN: A043021C000547107

Place: Thane & **Date:** 30/06/2021

Note – Due to outbreak of **Noval Corona Virus** (“Covid-19”) in the Country and in compliance of Government of Maharashtra orders and restrictions of movement of people, I am doing work from home therefore, signing of this submission is being submitted as Digital Signature.