



## B R Gupta & Co. Company Secretaries

**Office Add.:** Unit No. 12, 1<sup>st</sup> 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 31<sup>ST</sup> 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 31<sup>st</sup> 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 <sup>st</sup> 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.