



J V Wadhvani & Associates

Company Secretaries & Registered Trademark Agent

CS Jaikishan V. Wadhvani (FCS, LLB, M. Com)

SECRETARIAL COMPLIANCE REPORT OF ALKA INDIA LIMITED
FOR THE FINANCIAL YEAR ENDED MARCH 31, 2025

[Pursuant to Regulation 24A read with SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

I have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate governance practices by **Alka India Limited** (hereinafter referred as 'the listed entity'), having its registered office at GALA NO. D- 3/4/5, HATKESH UDYOG NAGAR-1, OFF. MIRA BHAYANDAR ROAD, GCC ROAD, MIRA NEAR HATKESH SUBSTATION MIRA ROAD, THANE - 401 107. The secretarial review was conducted in a manner that provided a reasonable basis for evaluating the corporate conducts / statutory compliances and provide my observations thereon.

Based on my verification of the listed entity's books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Review, I hereby report that the listed entity has, during the review period covering the financial year ended on March 31, 2025 complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter

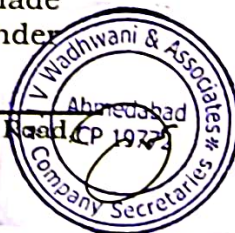
I Jaikishan V Wadhvani of **J V Wadhvani & Associates** have examined:

- (a) all the documents and records made available to us and explanation provided by **ALKA INDIA LIMITED** (CIN: L99999MH1993PLC168521) ("the listed entity"),
- (b) Filing and submission made by Resolution Professional under the CIRP proceedings on the behalf listed entity to the stock exchange;
- (c) website of the listed entity (Not Functioned); and
- (d) We have received the Management Representation Letter, along with Supporting Docs form CS/Compliance officer on which we have relied upon to make this Certification.

for the financial year ended **March 31, 2025** ("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");

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The specific Regulations, whose provisions and the circulars / guidelines issued thereunder, have been examined, include: -

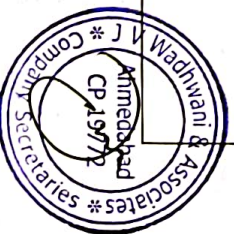
- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015. **(Non-Compliances/Delayed Compliances has been observed During the Reviewed Period.)**
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **(Not Applicable for the year under report)**
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011. **The listed entity has not complied with the regulations during the review period.**
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **(Not Applicable for the year under report)**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not Applicable for the year under report)**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not Applicable for the year under report)**
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015. **The listed entity has not complied with the regulations during the review period**
- (h) Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018. **The listed entity has not complied with the regulations during the review period**
- (i) Securities and Exchange Board of India (Registrar to an Issue and Share Transfer Agents) Regulations, 1993. **The listed entity has not complied with the regulations during the review period**
- (j) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021 **(Not Applicable for the year under report)**
- (k) Securities and Exchange Board of India (Investor Protection and Education Fund) Regulations, 2009.
(Not Applicable for the year under report)

and circulars/ guidelines issued thereunder. and based on the Above Examination, I hereby report that, during the review period; I hereby report that, during the Review Period the compliance status of the listed entity is appended as below:



(a) All the Compliances 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)	Regulation / Circular No.	Deviations	Action Taken by	Type of Action / Advisory / Clarification / Fine / Show Cause Notice / Warning, etc.	Details of Violation	Fine Amount	Observations / Remarks of the Practicing Company Secretary	Management Response	Remarks
1.	Website Disclosure	Regulation 46	Not Complied	-	-	Website not Maintained	NIL	The Listed Entity has Not maintained functional website as required	The company Under CIRP pursuant to order of Hon'ble NCLT hence, Operations and Compliances were under the supervision of Resolution Professional.	Not Complied
2	SDD Compliance	SEBI (PIT) Regulations	Not complied with	-	-	Entries of UPSI not maintained	NIL	The Listed Entity has not maintained UPSI entries as required	The company Under CIRP pursuant to order of Hon'ble NCLT hence,	Not Complied



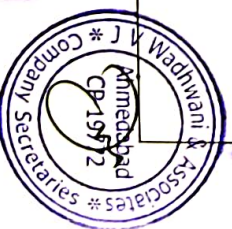
								Operations and Compliances were under the supervision of Resolution Professional.		
3	Financial Results	Regulation 33	Complied	-	-	Results published	NIL	The Listed Entity has published quarterly & Half yearly Results	The company Under CIRP pursuant to order of Hon'ble NCLT hence, Operations and Compliances were under the supervision of Resolution Professional.	Complied
4.	Shareholding pattern	Regulation 31	Not complied			Shareholding Pattern not Submitted	NIL	The Listed Entity has not Submitted quarterly Shareholding Pattern	The company Under CIRP pursuant to order of Hon'ble NCLT hence, Operations and Compliances	Not Complied



								were under the supervision of Resolution Professional.		
5.	Annual Report	Regulation 34	Not complied with	-	-	Annual Report not published	NIL	The Listed Entity has not published Annual Report	The company Under CIRP pursuant to order of Hon'ble NCLT hence, Operations and Compliances were under the supervision of Resolution Professional.	Not Complied
6	Reconciliation of Share capital Audit Report	Regulation 76	Not complied with	-	-	Report not Submitted For Quarter 1 to 3 of FY 2024-25	NIL	The Listed Entity has Not submitted quarterly report	The company Under CIRP pursuant to order of Hon'ble NCLT hence, Operations and Compliances were under the supervision	Not Complied



									of Resolution Professional.	
7.	Compliance Certificate	Regulation 74(5)	Not complied with	-	-	Compliance Certificate not Submitted For Quarter 1 to 3 of FY 2024-25	NIL	The Listed Entity has Not submitted Quarterly Compliance Certificate.	The company Under CIRP pursuant to order of Hon'ble NCLT hence, Operations and Compliances were under the supervision of Resolution Professional.	Not Complied
8.	Committee Meeting of SRC and NRC and audit committee	Regulation 18, Regulation 19 and 20	Not complied with	-	-	The Board Was Suspended During the CIRP proceedings, there were, The Committee were formed after approval of Resolution Plan.	NIL	The Listed Company has not Complied with the provision	The company Under CIRP pursuant to order of Hon'ble NCLT hence, Operations and Compliances were under the supervision of Resolution Professional.	Not Complied



9.	Trading Window	Regulation 9	Partially Complied	-	-	Delay in filing of the Trading window Disclosure on Exchange	NIL	The Listed Company has Made Delay in Filing the Trading Window Disclosure	The company Under CIRP pursuant to order of Hon'ble NCLT hence, Operations and Compliances were under the supervision of Resolution Professional.	Not Complied
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(b) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr No.	Compliance Requirement (Regulations / circulars / guidelines including specific clause)	Regulation / Circular No.	Deviation	Action Taken by	Type of Action / Clarification / Fine / Cause / Notice / Warning, etc.	Details of Violation	Fine Amount	Observations / Remarks of the Practicing Company Secretary	Management Response	Remarks
The Listed Company has not taken any Action on the Observation Made in the previous reports as the Company is The company Under CIRP pursuant to order of Hon'ble NCLT hence, Operations and Compliances were under										



the supervision of Resolution Professional, hence only the Compliance related to the Outcome of COC meetings and Intimation & Outcome of Financial Statements.

I hereby report that, during the Review Period the compliance status of the listed entity is appended as below:

Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations / Remarks by PCS*
1	Secretarial Standards: The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.	NO	The Company was under CIRP, and the Operations are under the Supervision of the RP. Hence no Record is maintained as per Secretarial Standard
2	Adoption and timely updating of the Policies: <ul style="list-style-type: none"> All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities; All the policies are in conformity with SEBI Regulations; and have been reviewed & updated on time, as per the regulations / circulars / guidelines issued by SEBI. 	NO NO NO	The Company was under CIRP, and the Operations are under the Supervision of the RP. Hence no updation in any Policy under the CIRP.
3	Maintenance and disclosures on Website: <ul style="list-style-type: none"> The Listed entity is maintaining a functional website; Timely dissemination of the documents / information under a separate section on the website; Web-links provided in annual corporate governance; reports under Regulation 27(2) are accurate and specific which re-directs to the relevant document(s) / section of the website. 	NO NO NO NO	The Company has not maintained the Website
4	Disqualification of Director:		



Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations / Remarks by PCS*
	*None of the Director(s) of the Company is / are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity. *(As per MCA Records as on March 31, 2025)	YES	During the CIRP proceeding the Board Was Suspended, The Current board Was Appointed on 18/02/2025 after the Approval of the Resolution Plan in NCLT.
5	Details related to Subsidiaries of listed entities have been examined w.r.t.: (a) Identification of material subsidiary companies (c) Disclosure requirement of material as well as other subsidiaries	NA NA	The Listed Entity does not have any material subsidiary / Wholly owned subsidiary.
6	Preservation of Documents: The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.	YES	
7	Performance Evaluation: The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.	No	During the CIRP proceeding the Board Was Suspended, The Current board Was Appointed on 18/02/2025 after the Approval of the



Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations / Remarks by PCS*
	Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars / guidelines issued thereunder (or) The Actions taken against the Listed Entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges are specified in the Last Column		Operations and Compliances were under the supervision of Resolution Professional, Hence No Board was Present Prior to the Approval of the resolution Plan. The Current Board Was appointed on 18/02/2025
12	Resignation of Statutory auditors from the listed Entity or its material subsidiaries: In Case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and/ or its material subsidiary(ies) has / have complied with paragraph 6.1 and 6.2 of section V-D of Chapter V of the Master Circular on Compliance with the provisions of the LODR Regulations by listed entities.	YES	
13	Additional non-compliances, if any: No additional non-compliance observed for any SEBI regulation / circular / guidance note etc.	NO	The Company was under the CIRP, and the Operations are handled by the Resolution professional, No Compliances are made during the Year, Except the Intimation and Publishing of Results and



Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations / Remarks by PCS*
			Resolution Plan in NCLT. The Committee were formed after the Appointment of Directors.
8	Related Party Transactions: (a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or (b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved / ratified / rejected by the Audit Committee, in case no prior approval has been obtained.	NO NO	The Company was under CIRP, and the Controls and Operations are under the Supervision of the Resolution Professional, hence the approval related to Related Party is not applicable in this case
9	Disclosure of events or information: The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.	YES	The Company has not Complied or Timely filed any Disclosure under Schedule III, Except the Publishing of Financial results and Updates Regarding the Meetings of Committee of Creditors(COC)
10	Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	NO	Not maintained the SSD Software during the Review Period
11	Actions taken by SEBI or Stock Exchange(s), if any: No Actions taken against the listed entity / its promoters / directors / subsidiaries either by SEBI or by Stock Exchanges (including under the	NA	The company Under CIRP pursuant to order of Hon'ble NCLT hence,



Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations / Remarks by PCS*
			Outcome of Committee of Creditors Meeting, (Required as per order of the NCLT)

Assumptions & limitation of scope and review:

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial records and books of account of the listed entity.
4. This report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (LODR) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

Place: Ahmedabad
Date: May 27, 2025
UDIN: FO12338G000452021



**For J V Wadhvani & Associates
Practicing Company Secretary**

[Signature]
**Jalalshah V Wadhvani
(Proprietor)**

(FCS: 12338, COP: 19772)
Peer Review No.4989/2023
Firm Reg. No.: S2017GJ558800