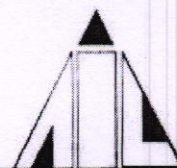


Amit International Limited



OFFICE : 403/A, Dalamal Chambers, 4th Floor, 29, New Marine Lines, Mumbai - 400 020
CIN No.: L17110MH1994PLCO76660

Date: 30/05/2022

To,
BSE Limited
P. J. Towers, Dalal Street,
Fort, Mumbai 400001

Subject: ~~Submission of Secretarial Compliance Report~~ under Regulation 24(A) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015


Ref. Scrip. Code: 531300, Stock Code: AMITINT

Pursuant to Regulation 24(A) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 we enclose herewith Secretarial Compliance Report from Practicing Company Secretary for the financial year ended 31st March, 2022

Kindly take the same on record and confirm

Thanking you
Yours Faithfully

For Amit International Limited


Kirti Doshi
Managing Director
(DIN: 01964171)

**Secretarial Compliance Report of Amit International Limited for the
financial year ended 31st March, 2022**

To,
Amit International Limited
Mumbai

I, Kunjal Dalal, Practicing Company Secretary have examined:

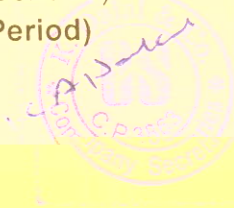
- (a) all the documents and records made available to us and explanation provided by Amit International Limited ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) any other document/ filing as may be relevant,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

for the year ended 31/03/2022 ("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 there under; and
- (b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India ("SEBI");

The specific Regulations, whose provisions and the circulars / guidelines issued there under, 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 (Issue of Capital and Disclosure Requirements) Regulations, 2018; **(Not Applicable to the Company during the audit 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 audit Period)**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not Applicable to the Company during the audit Period)**



105, 'Pawan Hans', B/h. Chamunda Restaurant, Sub Jail Char Rasta, Ring Road, Surat-395 002.

(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not Applicable to the Company during the audit 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 audit Period)**

(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

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 there under, 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
01	Appointment of qualified company secretary as the compliance officer – Regulation 6(1) of SEBI (LODR) Regulation, 2015.	Company has not appointed qualified company secretary.	We are informed that Company is in Process of appointing Company Secretary.
02	Compliance Certificates – Regulation 7(3) of SEBI (LODR) Regulation, 2015 is not filed timely and not signed by qualified compliance officer.	Compliance certificate for half year ended 31/03/2021 signed by MD as compliance officer and not CS as compliance officer. Further for period ended 31/03/2021, the Certificate was delayed submitted.	The Certificate has been signed by managing Director who acted as Compliance officer in absence of CS. Further for period ended 31/03/2021, the Certificate was submitted delayed.

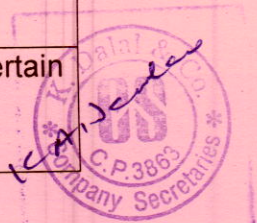


			account of liaisoning with RTA on account of Covid.
03	Submission of Shareholding pattern – Regulation 31(1)(b) of SEBI (LODR) Regulations, 2015.	Shareholding Patterns (SHP) was not submitted within the Prescribed time for the quarter ended 31/03/2021 and 30/06/2021	The SHP for 31/03/2021 was submitted on 24/04/2021 and for 30/06/2021 SHP was submitted on 20/10/2021. We are informed



105, 'Pawan Hans', B/h. Chamunda Restaurant, Sub Jail Char Rasta, Ring Road, Surat-395 002.

05	Submission of Related Party Transaction – Regulation 23(9) of SEBI (LODR) Regulations, 2015	Company has not submitted Related Party Transaction for the half year ended 31/03/2021 and 30/09/2021.	No comments from PCS except that we are informed that data could not be complied on account of Covid.
06	Maintenance of Structural Digital Database – Regulation 3 (5) of SEBI (PIT) Regulations, 2015	Company has not put in place the Structural Digital Database.	We are informed that company is in process of maintaining the required Structural Digital Database.
07	Submission of Financial Results – Regulation 33 of SEBI (LODR) Regulations, 2015 read with 30(6) and Part A of Schedule III of SEBI (LODR) Regulations, 2015.	Financial Result for period ended 30/06/2021 and 30/09/2021 was delayed submitted.	Financial Result for period ended 30/06/2021 was submitted on 24/11/2021 and date of Limited Review Report was 18/08/2021 and the Financial Result for period ended 30/09/2021 was submitted on 10/11/2021 and XBRL Result was submitted on 12/11/2021. We are informed that delay was on account of covid
08	Service of Annual Report – Regulation 36 SEBI (LODR) Regulations, 2015	Company has not produced before us the proof the service of Annual Report to the shareholders.	Proof of service of notice have not been produced before us for verification.
09	Copies of newspaper advertisements –	Company has not produced before us the published copies of all the	Copies of certain newspaper advertisement



105, 'Pawan Hans', B/h. Chamunda Restaurant, Sub Jail Char Rasta, Ring Road, Surat-395 002.

	Regulation 47 of SEBI (LODR) Regulations, 2015.	newspaper advertisements with respect to Publication of financial results and notice of AGM as required under Regulation 47 of SEBI (LODR) Regulations, 2015.	published have not been produced before us for verification.
10	Updation of web address by the company – Regulation 46 of SEBI (LODR) Regulations 2015.	Website of the company is not updated.	We are informed that company is in process of updating the website
11	Payment of Fees to Exchange – Regulation.. 14. of. SEBI (LODR) Regulations, 2015.	Company has not produced before us proof of payment of annual listing fees to exchange.	Nil
12	Peer Review of Statutory auditors – Regulation 33(1)(d) of SEBI (LODR) Regulations, 2015.	The Auditor appointed by the company for limited review reports and audit reports is yet to subject himself to the peer review process.	Confirmation form Statutory Auditor regarding holding of valid peer review certificate have not been produced before us.
13	Submission of Investor Compliant Report –	Investor Compliant Report for period ended 30/06/2021, was submitted on 02/07/2021.	Investor Compliant Report for period ended 30/06/2021, was submitted on 02/07/2021.



	(LODR) Regulations, 2015.		on 12/08/2021. We are informed that delay was on account of covid
15	Submission of Corporate Governance Report – Regulation 27 of SEBI (LODR) Regulations, 2015.	Corporate Governance Report for quarter ended 30/06/2021 and 30/09/2021 was delayed submitted.	Corporate Governance Report for quarter ended 30/06/2021 was delayed submitted on 20/10/2021 and for quarter ended 30/09/2021 Report was submitted on 22/04/2022. We are informed that delay was on account of covid.
16	Composition of Nomination and Remuneration Committee – Regulation 19 of SEBI (LODR) Regulations, 2015.	Nomination and Remuneration Committee comprises of One executive and two non executive directors.	Requirement of at least three non-executive directors is not complied with. We are informed that company is in process of appointing the required directors.
17	Submission of Annual Report – Regulation 34 of SEBI (LODR) Regulations, 2015.	Annual Report is not submitted to Stock exchange within the prescribed time limit.	Annual Report was delayed submitted on 18/09/2021 for AGM held on 30/09/2021. We are informed that delay was on account of covid.
18	Compliance Certificates – Regulation 40(9) of SEBI (LODR) Regulation, 2015 is not filed timely and not signed by qualified compliance officer.	Compliance certificate for half year ended 31/03/2021 was delayed submitted on 10/06/2021.	We are informed that delay was on account of laisioning with RTA on account of Covid.

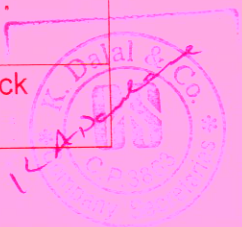
105, 'Pawan Hans', B/h. Chamunda Restaurant, Sub Jail Char Rasta, Ring Road, Surat-395 002.

19	Compliance Certificate – Regulation 74(5) of Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018	Company has not filed / delayed filed Compliance Certificate to Stock exchange within the prescribed time limit.	Company has not timely submitted certificate for period ended 31/03/2021 and 30/06/2021 whereas the Period ended 31/12/2021 the certificate is yet not submitted. We are informed that delay was on account of covid.
20	Intimation of Closure of Trading Window – Sub Clause 2 of Clause 4 of Schedule B of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015	Company has not submitted / delay submitted timely intimation of Closure of Trading Window to the Stock exchange.	Company has not timely submitted intimation of Closure of Trading Window for period ended 31/03/2021 and 30/06/2021 whereas for period ended 30/09/2021 the intimation of Closure of Trading Window was not submitted.

(b) The listed entity, has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under 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 there under:

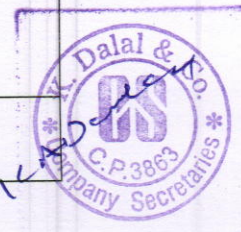
Sr. No.	Action taken by	Details of Violation	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
Company has not informed us regarding any action taken by SEBI or by Stock Exchanges during the year.				



105, 'Pawan Hans', B/h. Chamunda Restaurant, Sub Jail Char Rasta, Ring Road, Surat-395 002.

(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 31/03/2021	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
01	Appointment of qualified company secretary as the compliance officer – Regulation 6(1) of SEBI (LODR) Regulation, 2015.	31 st March, 2021	Company is in process of Appointing Company Secretary.	Nil
02	Compliance Certificates – Regulation 7(3) of SEBI (LODR) Regulation, 2015 is not filed timely and not signed by qualified compliance officer.	31 st March, 2021	No Action required by company.	Certificate was signed by MD who has acted as Compliance officer in absence of CS.
03	Submission of Shareholding pattern – Regulation 31(1)(b) of SEBI (LODR) Regulations, 2015.	31 st March, 2021	No Action required by company.	Nil
04	Submission of Annual Secretarial Compliance Report – SEBI Circular CIR/CFD/CMD11/27/2019 dated February 8, 2019.	31 st March, 2021	Timely Complied in subsequent year	Nil
05	Submission of Reconciliation of Share	31 st March, 2021	No Action required by	Nil



K. Dalal & Co.

Company Secretaries

(O) 0261-2366670

(M) 092279 00395

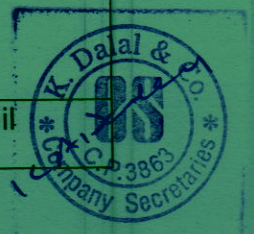
E-mail : k_dalal@rediffmail.com

405, 'Dewan Haveli' B/h. Chhambda Restaurant, Sub Jail Char Rasta, Ring Road, Surat-395 002



105, 'Pawan Hans', B/h. Chamunda Restaurant, Sub Jail Char Rasta, Ring Road, Surat-395 002.

11	Copies of newspaper advertisements – Regulation 47 of SEBI (LODR) Regulations, 2015.	31 st March, 2021	No Action required by company.	Nil
12	Updation of web address by the company – Regulation 46 of SEBI (LODR) Regulations 2015.	31 st March, 2021	Company is in process of updation of website.	Details not produced before us.
13	Payment of Fees to Exchange – Regulation 14 of SEBI (LODR) Regulations, 2015.	31 st March, 2021	Company is in process of making compliance	Details not produced before us.
14	Intimation of Appointment of Company Secretary – Regulation 30 (6) read with Part A of Schedule III of SEBI (LODR) Regulations, 2015	31 st March, 2021	Company is in process of appointing company secretary	Nil
15	Peer Review of Statutory auditors – Regulation 33(1)(d) of SEBI (LODR) Regulations, 2015.	31 st March, 2021	No Action taken by the company	Details not produced before us.
16	Submission of Investor Compliant Report – Regulation 13 of SEBI (LODR) Regulations, 2015.	31 st March, 2021	No action required by company	Nil
17	Prior Intimation of Board	31 st March, 2021	No action	Nil



105, 'Pawan Hans', B/h. Chamunda Restaurant, Sub Jail Char Rasta, Ring Road, Surat-395 002.

	Meeting – Regulation 29 of SEBI (LODR) Regulations, 2015.		required by company	
18	Submission of Corporate Governance Report – Regulation 27 of SEBI (LODR) Regulations, 2015.	31 st March, 2021	The company is in process of making compliance	Nil
19	Composition of Nomination and Remuneration Committee – Regulation 19 of SEBI (LODR) Regulations, 2015.	31 st March, 2021	The company is in process of making compliance	Nil

For K. Dalal & Co.
Company Secretaries

Place: Surat

Date: 30/06/2022

UDIN: F003630000434817

Peer Review Certificate No. 1315/2021

Unique Code Number: 1496

*K. A. D. Dalal***Kunjal Dalal**