

SEC/2005/2022

**By E-Filing**

20<sup>th</sup> May, 2022

National Stock Exchange of India Ltd. "Exchange Plaza", C-1, Block G, Bandra- Kurla Complex, Bandra (E), <b>Mumbai – 400 051.</b> <b>Scrip Symbol : APARINDS</b>	BSE Ltd. Corporate Relationship Department, 27 <sup>th</sup> Floor, Phiroze Jeejeebhoy Towers, Dalal Street, Fort, <b>Mumbai - 400 001.</b> <b>Scrip Code : 532259</b>
<b>Kind Attn. : The Manager, Listing</b>	<b>Kind Attn. : Corporate Relationship Dept.</b>



**CS Hemang M. Mehta**

B.Com., LL.B.(Special), F.C.S.

**H. M. Mehta & Associates**

**Company Secretaries**

**SECRETARIAL COMPLIANCE REPORT OF APAR INDUSTRIES LIMITED  
FOR THE FINANCIAL YEAR ENDED 31<sup>ST</sup> MARCH, 2022**

I, Hemang Mehta, Proprietor of H. M. Mehta & Associates, Practicing Company Secretaries have examined:

- a) all the documents and records made available to me and explanation provided by APAR Industries 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 financial year ended 31<sup>st</sup> March, 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 Rules; 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, as amended from time to time;
- b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; - *Not Applicable during the review period*

e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014

- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;
- j) Securities and Exchange Board of India (Depositories and Participants) Regulations, 1996 / 2018;
- k) During the financial year under review, the reporting of clauses 6(A) and 6(B) of the circular issued by the Securities and Exchange Board of India bearing no.: CIR/CFD/CMD1/114/2019 dated 18<sup>th</sup> October, 2019 on "resignation of statutory auditors from the listed entities and their material subsidiaries" is not applicable.

and circulars/ guidelines issued thereunder;

and based on the above examination and considering the relaxations granted by the Ministry of Corporate Affairs (MCA) and Securities and Exchange Board of India (SEBI) warranted due to the spread of the COVID-19 pandemic, 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
	NIL	NIL	NIL
Not Applicable during the review period			

- b) The listed entity has maintained proper records under the provision of the above

The following are the details of actions taken against the

- 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 previous reports	Observations made in the Secretarial Compliance Report for the year ended 31 <sup>st</sup> March, 2022	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
Not Applicable during the review period				

- e) During

H. M. MEHTA & ASSOCIATES  
COMPANY SECRETARIES

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ANNEXURE TO SECRETARIAL COMPLIANCE REPORT

To,  
The Members  
APAR Industries Limited

The Secretarial Compliance Report of even date is to be read along with this letter.

As the Company Secretaries, we have conducted the Secretarial Audit of the Company in accordance with the Securities and Exchange Board of India Act, 1992 (SEBI Act) and the Securities

reasonable assurance about the correctness of the

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