



May 21, 2022

To,
The Secretary,
Market Operations Department,
The BSE Ltd.
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai – 400 023.

Capital Market Operations
The National Stock Exchange of India Ltd.
Exchange Plaza, 5th Fl., Plot No.C/1,
G Block, Bandra-Kurla Complex,
Bandra (E),
Mumbai – 400 051.

Scrip Code: 500003

Scrip Code: AEGISCHEM

Dear Sir,

Sub. : Annual Secretarial Compliance Report for the year ended 31st March, 2022

Ref. : SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019

We are enclosing herewith the Annual Secretarial Compliance Report for the year ended March 31, 2022, issued by M/s. P. Naithani & Associates, Secretarial Auditor of the Company.

Kindly take the same on record.

Thanking you.

Yours faithfully,
For AEGIS LOGISTICS LIMITED

MONICA GANDHI
COMPANY SECRETARY

Encl. : As above



P. NAITHANI & ASSOCIATES

Company Secretaries

902, B Wing, Venus Tower, Veera Desai Road, Andheri (W), Mumbai - 400053.
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Secretarial compliance report of *AEGIS LOGISTICS LIMITED* for the year ended 31st March 2022

I, Prasen Naithani, of P.Naithani & Associates, have examined:

- (a) all the documents and records made available to us and explanation provided by AEGIS LOGISTICS 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, 2022, for the period from 1st April, 2021 to 31st 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 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) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009 – **Not Applicable**;
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 1998 – **Not Applicable**;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 – **Not Applicable**;
- (f) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 – **Not Applicable**;
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 – **Not Applicable**;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
and circulars/ guidelines issued thereunder;



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 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
1	Regulation 34(1)(a) of SEBI (Listing Obligation and Disclosure Requirements) 2015	The Company has uploaded the Annual Report on the Stock exchange portal 2 days later than the commencement of dispatch to its shareholders.	The Company has received letter dated 30, December 2021 from BSE and NSE for delay in compliance with regulations 34(1)(a) of SEBI (LODR) 2015.

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder 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 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.	Communication received by the company from BSE and NSE dated 30/12/2021	As per Regulation 34(1)(a) of SEBI (Listing Obligation and Disclosure Requirement) 2015, the company is required to submit Annual Report to the Stock Exchanges simultaneously with commencement of dispatch to its shareholders. The Company has however uploaded	Fine of Rs 4720/- each was levied by BSE and NSE.	The Company has paid fines as levied by BSE and NSE and also has made waiver application to BSE and NSE as the delay in compliance was exceptional due to covid condition prevailing at office premises and work from home created



		the Annual Report on the Stock Exchange portal 2 days later but prior to 21 days of the Annual General Meeting of the Company in due compliance with regulation 36 of the SEBI LODR.		hindrances due to technical issues. The waiver application is still under consideration of BSE and NSE.
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(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, 2021	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
NIL				

**For P. Naithani & Associates
Company Secretaries**



Prasen Naithani
FCS No. 3830
C.P. No. 3389
PR.No.1131/2021

Place: Mumbai

Date: 21st May, 2022

UDIN: F003830D000359999