

GUJARAT APOLLO INDUSTRIES LIMITED

"Parishram", Cellar, 5-B, Rashmi Society, Nr. Mithakhali Circle, Navrangpura, Ahmedabad-380 009, Gujarat, India. Tel. +91-79- 26444597/98, 26564705

June 30, 2021

Dy. General Manager BSE Limited Corporate Relation Department, P.J. Towers, Dalal Street, Fort, Mumbai - 400 001	The Manager National Stock Exchange of India Limited Exchange Plaza, Bandra Kurla Complex, Bandra (E), Mumbai - 400 051
Scrip ID: GUJAPOIND; Scrip Code: 522217	Scrip Symbol: GUJAPOLLO

Dear Sir/Madam,


Subject: Submission of Annual Secretarial Compliance Report

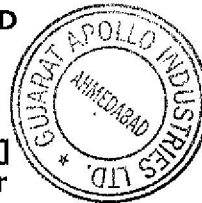
In terms of the provisions of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/ CIR/CFD/CMD1/27/2019 dated 8th February, 2019, please find enclosed herewith Secretarial Compliance Report of the Company issued by M/s. Ashish Shah & Associates, Company Secretaries, Ahmedabad, for the financial year ended 31st March, 2021.

Please take the same on your record.

Thanking You,

For **GUJARAT APOLLO INDUSTRIES LIMITED**


CS Neha Chikani Shah [M'ship No:A-25420]
Company Secretary and Compliance Officer





ASHISH SHAH & ASSOCIATES

Company Secretaries & Trade Mark Agent | Insolvency Resolution Professional

402, "Shaival Plaza", 4th Floor, Gujarat College Road, Besides Hope Hospital, Ellisbridge, Ahmedabad - 380 006.
Mobile : 098259 40391 | Tel. : 079-26420336 / 7 / 9 | Fax : 079-26424100 | E-mail : ashish@ravics.com

Secretarial compliance report of GUJARAT APOLLO INDUSTRIES LIMITED for the year ended 31st March, 2021

I Ashish Shah has examined:

- all the documents and records made available to me and explanation provided by Representative of GUJARAT APOLLO INDUSTRIES LIMITED ("the listed entity"),
- the filings/ submissions made by the listed entity to the stock exchanges,
- website of the listed entity,
- other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31st March, 2021 in respect of compliance with the provisions of:

- the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- 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:-

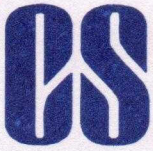
- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
- 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:

- 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.	Reg. 23(9) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.	Delay of 26 days in submitting the disclosure on related party transactions on consolidated basis for the quarter ended on	Company has submitted the disclosure on related party transactions on consolidated basis for the quarter ended on 30.09.2020 with a delay of





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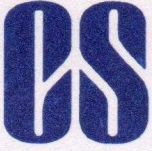
		30.09.2020 with the Stock Exchange(s).	26 days for which BSE and NSE have levied fines on the Company.
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- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from my/our 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 Limited and National Stock Exchange of India Ltd.	Delay of 26 days in submitting the disclosure on related party transactions on consolidated basis for the quarter ended on 30.09.2020 with the Stock Exchange(s).	<p>BSE Limited has issued e-mail on January 18, 2021 for non-submission of disclosure on related party transactions on consolidated basis for the quarter ended on 30.09.2020 with the Stock Exchange and imposed fine of Rs. 1,53,400/-</p> <p>National Stock Exchange of India Limited has issued notice No. NSE/LIST-SOP/REG-23/FINES-084 Dated January 18, 2021 for non-submission of disclosure on related party transactions on consolidated basis for the quarter ended on 30.09.2020 with the Stock Exchange and imposed fine of Rs. 1,53,400/-</p> <p>However, same was subsequently waived by both the Stock Exchanges.</p>	On request of the Company both the stock exchanges have waived the fine imposed by them.

- (d) The listed entity has taken the following actions to comply with the observations made in previous reports:





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Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended on 31 st March, 2019 (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
N.A.				

Place: Ahmedabad
Date: 30th June, 2021

For, Ashish Shah & Associates



Ashish Shah
Company Secretary in practice
FCS No. 5974
C P No.: 4178
UDIN: F005974C000557461