

**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

**May 28, 2022**

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

Dear Sir/Madam,

**Subject: Submission of Annual Secretarial Compliance Report**

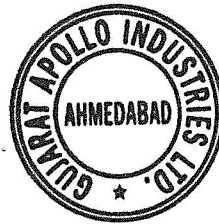
In terms of the provisions of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/ CIR/CFD/CMD1/27/2019 dated 8<sup>th</sup> February, 2019, please find enclosed herewith Secretarial Compliance Report of the Company issued by M/s. Ashish Shah & Associates, Company Secretaries, Ahmedabad, for the financial year ended 31<sup>st</sup> March, 2022.

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", 4<sup>th</sup> 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 31<sup>st</sup> March, 2022

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 31<sup>st</sup> March, 2022 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.	Filing of Reclassification Application within 30 days from the date of approval by shareholders in General	Company made delay of 18 days in filing the application for reclassification of	BSE Ltd. and National Stock Exchange of India Ltd., each have imposed fines of Rs. 1,06,200/-





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Meeting pursuant to Regulation 31A(3)(a) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	persons belonging to promoter and promoter group to public group.	respectively on the Company for such delay. Company has paid fine with both the Stock Exchange(s).  Company ensured future compliance in this matter.
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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 Ltd. and National Stock Exchange of India Ltd.	Company made delay of 18 days in filing the application for reclassification of persons belonging to promoter and promoter group to public group.	BSE Ltd. and National Stock Exchange of India Ltd., each have imposed fines of Rs. 1,06,200/- respectively on the Company for such delay.	Company has paid fine with both the Stock Exchange(s).  Company ensured future compliance in this matter.

- (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 <sup>st</sup> March, 2021 (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
1.	Nil	Company has submitted the disclosure on related party transactions on consolidated basis for the quarter ended on 30.09.2020 with a delay of 26 days for which BSE and NSE have levied fines on the Company.	Company has submitted the application for waiver of fine imposed by BSE Limited and National Stock Exchange of India Limited for non-submission of disclosure on related party transactions on consolidated basis for the quarter ended on 30.09.2020 and the same was subsequently waived by both the Stock Exchanges.	On request of the Company both the stock exchanges have waived the fine imposed by them.

Place: Ahmedabad  
Date: 28<sup>th</sup> May, 2022

For, Ashish Shah & Associates

Ashish Shah  
Company Secretary in practice  
FCS No. 5974  
C P No.: 4178  
UDIN: F005974D000419321

