Alps Industries Ltd. REGD./CORP. OFFICE 57/2, Site-IV, Industries Area Sahibabad, Ghaziabad - 201010 Uttar Pradesh (India)

ALPS/468/SE10/2019-2020

May 04, 2019

The General Manager	Ms. Erika D'Sa, (Relationship Manager)
Market Operations Deptt.,	Corporate Relationship Deptt.,
National Stock Exchange of India Ltd.,	Bombay Stock Exchange Limited,
Exchange Plaza, 5th Floor,	1 ST Floor New Trading Ring,
Plot No. C/1, G-Block, Bandra-Kurla Complex	Rotunda Building, P. J. Towers,
Bandra (E), Mumbai - 400 051	Dalal Street, Fort, Mumbai-400 001.
Ph - 91-22-2659 8101 - 8114	Ph - 022-22728995
Fax: 022 - 26598237/38/ 2659 8100	Fax: 022 - 22723121 /
Email - cmlist@nse.co.in	3719/2037/2039/2041/2061
	Email – intern.erika@bseindia.com ,
	corp.relations@bseindia.com

SUB : SUBMISSION OF ANNUAL SECRETARIAL COMLIANCE REPORT IN TERMS OF SEBI CIRCULAR NO. CIR/CFD/CMD1/27/2019 DATED 08.02.2019.

Dear Sir,

This has in reference to the SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019 applicable w.e.f financial year ending on March 31, 2019. As required, we are submitting herewith Annual Secretarial Compliance Report for the year ending on 31st March, 2019 duly certified by Practicing Company secretary.

This is for your kind information please.

Thanking you,

Yours faithfully, For **ALPS INDUSTRIES LIMITED**

(Ajay Gupta) Company Secretary & General Manager - Legal Encl. a/a.

RAJIV KHOSLA & ASSOCIATES

PRACTISING COMPANY SECRETARY

8-56, Shalimar Garden, Chhabra Colony, Shalimar Housing Complex, Sahibabad, U.P.-201005 Mobile : 9811583699 Telefax : 95120-2610974 E-mail khosla.rk1972@yahoo.co.in • khosla.rajivfcs@gmail.com

Secretarial Compliance Report

Of

Alps Industries Limited for the year ended 31st March, 2019.

I, **Rajiv Khosla, the Proprietor of M/s. Rajiv Khosla & Associates,** Company Secretaries having office at B-56, Shalimar Garden, Chhabra Colony, Shalimar Housing Complex, Sahibabad, Uttar Pradesh-201005 have examined:

(a) all the documents and records made available to us and explanation provided by **Alps 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 year ended **31**st **March, 2019** ("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**



(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**

(e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **Not Applicable**

(f) 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 (Delisting of Equity Shares) Regulations, 2009;

and circulars/ guidelines issued there under;

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
	I	NA	

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

Sr. Ne.	Action taken by	Details o ^f violation	taken E.g. fines, warning letter, debarment. etc.	Observations/ remarks of the Practicing Company Secretary, if any.
			NA	

(d) The listed entity has taken the following actions to comply with the opservations made in previous reperts:.

Sr. No.	No. Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended on 31st March, 2019	entity, if any	Comments of the Practicing Company Secretary on the actions taken by the fisted entity
_		NA		

For RAJIV KHOSLA & ASSOCIATES

Sahibabad C.P.NO, 3927

Rajiv Khoslamor FCS No.: 5197 C P No.: 3927

Pate: 25th April, 2019 Place: Ghaziabad