

AKM LACE AND EMBROTEX LIMITED

CIN: L17291DL2009PLC196375

Regd. Office: IX/6024, Ram Gali, Subhash Mohalla, Gandhi Nagar, Delhi-110031 **Corp. Office:** 328-329, RG Complex-II, Plot No.5, Sector-14, Rohini, Delhi-110085 Tel: 011-49856126, 9899173704 | E-mail: akmlace@gmail.com | website: www.akmlace.com

Date: 16.06.2020

To, BSE Limited 1st Floor, New Trading Ring, Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai-400001

Ref: SEBI Circular CIR/CFD/CMD1/27/2019 dated 8th February, 2019

Sub: Annual Secretarial Compliance Report for the Financial Year ended 31st March, 2020

Dear Sir,

With reference to the SEBI Circular CIR/CFD/CMD1/27/2019 dated 8th February, 2019, please find the enclosed Annual Secretarial Compliance Report for the financial year ended 31st March, 2020.

This is for Your information and record.

For AKM Lace & Embrotex Limited

DELH

Anoop Kumar Mangal Managing Director DIN: 02816077



SECRETARIAL COMPLIANCE REPORT OF

AKM LACE AND EMBROTEX LIMITED FOR THE FINANCIAL YEAR ENDED 31^{5T} MARCH, 2020

(Pursuant to Regulation 24A of SEBI (LODR) Regulations, 2015 vide SEBI Circular no. CIR/CFD/CMD1/27/2019)

We, VMS & Co., Practicing Company Secretary have examined:

- (a) all the documents and records made available to us and explanation provided by AKM LACE AND EMBROTEX LIMITED (CIN: L17291DL2009PLC196375) ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) all other document/ filing, as may be relevant, which has been relied upon to make this certification, for the year ended 31st March, 2020 ("Review Period") in respect of compliance with the provisions of:
 - I. the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- II. 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) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (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;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities)

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- (g) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations,2013;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Other Regulations, as applicable to the Company and circulars/ guidelines issued thereunder;
- and based on the above examination, we 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, <u>except</u> 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		

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far as it appears from 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.					
Nil								



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

Sr. No.	Observation s of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended 31 st March, 2020 (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		
NA						

VMS & Co., **Practicing Company Secretary**

Megha Sharan M. No. 9802 COP No. 12171

Date: 16.06.2020 Place: Delhi

UDIN; F009802B000347062