



Health & Wealth
We Manage Both

Alankit LIMITED

9th May, 2023

BSE Limited
P. J. Towers,
Dalal Street,
Mumbai – 400001

The National Stock Exchange of India Limited
Exchange Plaza, 5th Floor,
C-1, Block G, Bandra – Kurla Complex,
Bandra (E),
Mumbai – 400051
Symbol : ALANKIT

Script Code: 531082

Dear Sir/Ma'am,

Sub: Submission of Annual Secretarial Compliance Report for the year ended 31 March, 2023

In accordance with Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8 February, 2019, as amended, please find enclosed herewith, the Annual Secretarial Compliance Report of the Company for the year ended 31 March, 2023, issued by N.C. Khanna, Company Secretaries (COP No. 5143).

This is for your information and records

Thanking You.

Yours Faithfully,

FOR ALANKIT LIMITED

SUCHITA KABRA
COMPANY SECRETARY AND COMPLIANCE OFFICER

CIN : L74900DL1989PLC036860

Registered Office : 205-208, Anarkali Complex, Jhandewalan Extension, New Delhi -110055, India

Corporate Office : Alankit House, 4E/2, Jhandewalan Extension, New Delhi -110055, India

Phone : +91-11-4254 1234 / 2354 1234 | Fax : +91-11-2355 2001 | Website : www.alankit.in | email : info@alankit.com, investor@alankit.com

Listed on the National Stock Exchange (NSE) and the Bombay Stock Exchange (BSE)

To
The Board of Directors
ALANKIT LIMITED
CIN: L74900DL1989PLC036860
205-208, ANARKALI COMPLEX,
JHANDEWALAN EXTENSION
NEW DELHI-110055

Sub.: **Annual Secretarial Compliance Report for the Financial Year 2022-23**

Dear Sir,

We have been engaged by M/s. ALANKIT LIMITED (hereinafter referred to as the "Company") bearing CIN: L74900DL1989PLC036860 whose Equity Shares are listed on BSE Limited (BSE) and on National Stock Exchange of India Limited (NSE) to conduct an Audit in terms of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended and read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February 2019 including recent update by SEBI on said Circular, and to issue the Annual Secretarial Compliance Report thereon.

It is the responsibility of the management of the Company to record, devise proper systems to ensure Compliance with the provisions of all the applicable SEBI Regulations and Circulars/Guidelines issued thereunder from time to time and to ensure that the systems are adequate and are operating effectively.

Our responsibility is to verify Compliances made by the Company with respect to the provisions of all applicable SEBI Regulations and Circulars/Guidelines issued from time to time and issue a Report thereon.

Our Audit was conducted in accordance with Guidance Note on Annual Secretarial Compliance Report issued by the Institute of Company Secretaries of India and in a manner which involves such examinations and verifications considered and necessary and adequate for the said purpose. Annual Secretarial Compliance is attached herewith.

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Place: New Delhi

Date: 05/05/2023

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(Practicing Company Secretary)

FCS No.: 4268

CP No.: 5143

UDIN: F004268E000262658

ANNUAL SECRETARIAL COMPLIANCE REPORT

FOR THE FINANCIAL YEAR ENDED ON 31ST MARCH 2023

[Pursuant to Regulation 24(A) of the SEBI

(Listing Obligations and Disclosure Requirements) Regulations, 2015]

The Members

ALANKIT LIMITED

CIN: L74900DL1989PLC036860

205-208, ANARKALI COMPLEX,

JHANDEWALAN EXTENSION

NEW DELHI-110055

We have examined:

- a) All the documents and records made available to us and explanations provided by the Company;
- b) the filings/submissions made by the company to the Stock Exchanges;
- c) Website of the Company;
- d) Any other documents/filings, as may be relevant, which has been relied upon to prepare this Report.

For the financial year ended on March 31, 2023 in respect of Compliance with the provisions of:

1. The Securities and Exchange Board of India Act, 1992 ('SEBI Act') and the Regulations, Circular, Guidelines issued thereunder and;
2. The Securities Contracts (Regulation) Act, 1956 ('SCRA') and the rules made there under and the Regulations, Circular, Guidelines issued thereunder by the Securities & Exchange Board of India (SEBI);

The specific Regulations whose provisions and the Circulars/Guidelines issued thereunder have been examined, includes -

- a) The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015
- b) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- c) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- d) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- e) The Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; *
- f) The Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021* (*Not applicable as the Company has not issued and listed any debt securities during the financial year under review*)

- g) The Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; *
- h) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client (Not Applicable as the Company is not registered as Registrar to Issue and Share Transfer Agent during the financial year under review);
- i) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021*
- j) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; *

**(Not applicable as there is no reportable event held during the financial year under review);*

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, except in respect of matters specified below:
- **Refer Annexure “A” annexed to the Report**
- b) The listed entity has taken the following actions to comply with the observations made in previous reports:
- **Refer Annexure “B” annexed to the Report**

I further report that –

- The Company has complied with the requirements of Structural Digital Data Base in terms of Securities & Exchange Board of India (Prohibition of Insider Trading) Regulation, 2015 including various Circulars issued by SEBI thereunder and Circular(s) issued by BSE Limited dated March 16, 2023.
- During the year the Statutory Auditors of the Company M/s. B K Shroff & Co, Chartered Accountants, had resigned w.e.. 30/09/2022 and M/s. Nemani Garg Agarwal & Co, Chartered Accountants (FRN: 010192N), had been appointed w.e.f. 29/10/2022 as the Statutory Auditor of the Company. I report that the Listed Entity has complied with Circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019.

Further to the matter and as advised in the BSE Notice No. 20230329-21 dated 29th March 2023 as well as BSE Notice No. 20230410-41 dated 10th April 2023, following are the additional information which is the parts of ongoing Annual Secretarial Audit Report –

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks by PCS*
1.	Secretarial Standards: The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI)	Yes	Not Any

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2.	Adoption and timely updation of the Policies: <ul style="list-style-type: none"> All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities. All the policies are in conformity with SEBI Regulations and has been reviewed & timely updated as per the regulations/circulars/guidelines issued by SEBI 	Yes Yes	Not Any Not Any
3.	Maintenance and disclosures on Website: <ul style="list-style-type: none"> The Listed entity is maintaining a functional website Timely dissemination of the documents/information under a separate section on the website Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re-directs to the relevant document(s)/ section of the website 	Yes Yes Yes	Not Any Not Any Not Any
4.	Disqualification of Director: None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013	Yes	Not Any
5.	To examine details related to Subsidiaries of listed entities: <ol style="list-style-type: none"> Identification of material subsidiary companies. Requirements with respect to disclosure of material as well as other subsidiaries 	Yes Yes	Not Any
6.	Preservation of Documents: The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.	Yes	Not Any
7.	Performance Evaluation: The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations	Yes	Not Any
8.	Related Party Transactions: <ol style="list-style-type: none"> The listed entity has obtained prior approval of Audit Committee for all Related party transactions In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/ rejected by the Audit committee 	Yes No such Case	Not Any Not Any

9.	Disclosure of events or information: The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.	Yes	Not Any
10.	Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	Yes	Not Any
11.	Actions taken by SEBI or Stock Exchange(s), if any: No Actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder	N.A.	Not Any
12.	Additional Non-compliances, if any: No any additional non-compliance observed for all SEBI regulation/circular/ guidance note etc.	N.A.	Not Any

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N C KHANNA

(Practicing Company Secretary)

FCS No.: 4268

CP No.: 5143

UDIN: F004268E000262658

Place: New Delhi

Date: 05/05/2023

Annexure “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: –

Compliance Requirement (Regulations/Circulars/ guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action taken by	Type of Action (Advisory/Clarification/Fin e/Show Cause Notice/ Warning, etc.)	Details of Violation	Fine Amount	Observations / Remarks of the Practicing Company)	Management Response
Not Any	N.A.	NotAny	Not Any	Not Any	Not Any	Nil	Not Any	Not Applicable

Annexure “B”

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

Compliance Requirement (Regulations/Circulars/ guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action taken by	Type of Action (Advisory/Clarification/Fin e/Show Cause Notice/ Warning, etc.)	Details of Violation	Fine Amount	Observations / Remarks of the Practicing Company)
Not Any	N.A.	Not Any	Not Any	Not Any	Not Any	Nil	Not Any