



**M.D. BAID & ASSOCIATES**  
COMPANY SECRETARIES

2005-A, Rathi Palace, Lift No. 5,  
Ring Road, Surat-395 002.  
Ph. 0261-2330855, 4004855  
E-mail : mdbaid@gmail.com

**Secretarial compliance report of Anupam Rasayan India Limited  
(CIN: L24231GJ2003PLC042988)  
for the year ended March 31, 2021**

We have examined:

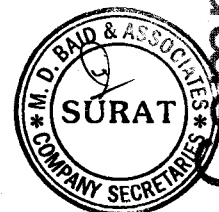
- (a) all the documents and records made available to us and explanation provided by Anupam Rasayan India Limited("the listed entity"),
- (b) the filings/submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) any other document/filing, as may be relevant, which has been relied upon to make this certification,

for the year ended March 31, 2021("Review Period") in respect to compliance with the provisions of:

- (a) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- (b) 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 - (There were no events requiring compliance during review period);
- (e) Securities and Exchange Board of India(Share Based Employee Benefits) Regulations, 2014(There were no events requiring compliance during review period);
- (f) Securities and Exchange Board of India ( Issue and Listing of Debt Securities) Regulations, 2008(There were no events requiring compliance during review period);
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013(There were no events requiring compliance during review period);
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) The provisions of the Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993



Company Secretaries



**M.D. BAID & ASSOCIATES**  
COMPANY SECRETARIES

2005-A, Rathi Palace, Lift No. 5,  
Ring Road, Surat-395 002.  
Ph. 0261-2330855, 4004855  
E-mail : mdbaid@gmail.com

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.
- (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) There were no actions taken against the listed entity/its promoters/directors/material subsidiaries either by SEBI or Stock Exchanges (including under the Standard Operating Procedure issued by SEBI through various circulars) under the aforesaid Acts/Regulation and circulars/guidelines issued thereunder in so far as it appears from my examination of those records.
- (d) The reporting of actions by the listed entity to company with the observation made in previous reports does not arise during the review period.

For M.D. Baid & Associates  
Company Secretaries



*25/06/2021*  
CS Mohan Baid  
Partner

ACS : 3598 CP : 3873  
UDIN A003598C000516539

Date : 25/06/2021

Place : Surat

Company Secretaries