One Star Export House



29th May, 2019

UAS/MSA/93

Bombay Stock Exchange Ltd., 25th Floor, P.J. Towers, Dalal Street, Mumbai - 400 001

Dear Sirs,

Sub: Compliance under Regulation 24(A) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Ref: Company Code No.504605.

In terms of Regulation 24(A) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, we enclose Secretarial Compliance Report dated 28th May, 2019, duly issued by Kaushik M. Jhaveri & Co., Practising Company Secretary, for the financial year ended March 31, 2019.

Kindly take the same on records.

Thanking you,

Yours faithfully, For Uni-Abex Alloy Products Ltd.

M.S. Ashar Company Secretary & Compliance Officer

Encl: as above A Neterwala Group Company

Factory: Plot No: 583 & 584 - A, Beiur Industrial Area, Dharwad, Karnataka - 580 011, 1NDIA: 1et.: +91 836 2971321 Regd. Office: Liberty Building, Sir Vithaldas Thackersey Marg, Mumbai - 400020. Tel.: +91-22-22032797 / 22-22091021 Fax: +91-22-22082113 Marketing office: 104, Dhanalaxmi Shopping Complex, Rutu Estate, Patlipada, Off G. B. Roac, Thane - 400607. Maharashtra, INDIA. Tel.: +91 22 41007760 | 25862055 | 25862060



CIN: L27100MH1972PLC015950 | | Email: uniabex@vsnl.com | Website: www.uniabex.com

Kaushik M. Jhaveri

B.COM, LL.B(Gen), FCS

US K.M.JHAVERI & CO.

Practising Company Secretary

SECRETARIAL COMPLIANCE REPORT OF UNI-ABEX ALLOY PRODUCTS LIMITED FOR THE YEAR ENDED MARCH 31, 2019

[Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

To,

The Board of Directors, Uni-Abex Alloy Products Limited Liberty Building, Sir Vithaldas Thackersey Marg, Mumbai – 400 020.

I, Kaushik M. Jhaveri, have examined:

- (a) all the documents and records made available to us and explanation provided by Uni-Abex Alloy Products Limited(CIN: L27100MH1972PLC015950) ("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 31st 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 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;



Page 1 of 3

Address: B/408, 4th Floor, Crystal Plaza, Opp Infinity Mall, Off New Link Road, Andheri (W), Mumbai 400 053. Mob. +91 9821034511 Email Id: <u>kaushikjhaverics1@gmail.com</u>

- (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, 1992;
- (d) 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;
- (e) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018

and circulars/ guidelines issued thereunder;

and based on the above examination, 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 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
	NIL		

- (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 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	the second	e.g. fine, warnin	n Observations/Remark g s of the Practicing Company Secretary, if any
			NIL	

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

Sr. No.	Remarks of the Practicing Company	made in the		Comments of the Practicing Company Secretary on the actions taken by the listed entity
------------	---	-------------	--	--

For Kaushik M. Jhaveri & Co.,

Kaushik M. Jhaveri Practising Company Secretary FCS No.: 4254

Date: 28th May, 2019 Place: Mum**b**ai

CP No.: 2592