

## Secretarial compliance report of ANIK INDUSTRIES LIMITED for the year ended 31.03.2021

(Pursuant to SEBI Circular CIR/CFD/CMD1/27/2019 dated February, 08, 2019)

We **AJIT JAIN & CO., PRACTICING COMPANY SECRETARY** have examined:

- all the documents and records made available to us and explanation provided by **ANIK INDUSTRIES LIMITED** (CIN:L24118MH1976PLC136836) ("the listed entity"),
- the filings/ submissions made by the listed entity to the stock exchanges,
- website of the listed entity,
- any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended **31<sup>ST</sup> MARCH, 2021** ("Review Period") in respect of compliance with the provisions of :

- the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- 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:-

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; (**NOT APPLICABLE DURING REVIEW PERIOD**)
- Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (**NOT APPLICABLE DURING REVIEW PERIOD**)
- Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (**NOT APPLICABLE DURING REVIEW PERIOD**)
- Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; (**NOT APPLICABLE DURING REVIEW PERIOD**)
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;



- (i) The Securities and Exchange Board of India (Registrar to an Issue and Share Transfer Agents) Regulations, 1993 as applicable and circulars/ guidelines issued thereunder;

And based on the above examination, We hereby report that, during the Review Period:

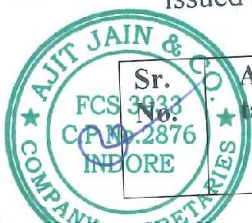
- (a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters specified below:-

Sr. No	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	Regulation 33 of SEBI (Listing obligations and Disclosure Requirements) Regulation, 2015	The Audited Financial Results for the Quarter and year ended 31 <sup>st</sup> March, 2020 was not submitted within time.	Company submitted audited financial results for the quarter and year ended 31 <sup>st</sup> March, 2020 after due date.
2.	Regulation 33 of SEBI (Listing obligations and Disclosure Requirements) Regulation, 2015	The Un-audited Financial Results for the Quarter ended 30 <sup>th</sup> June, 2020 was not submitted within time.	Company submitted un-audited financial results for the quarter ended 30 <sup>th</sup> June, 2020 after due date.
3.	Regulation 34 of SEBI (Listing obligations and Disclosure Requirements) Regulation, 2015	The Annual Report for the Financial Year ended 31 <sup>st</sup> March, 2020 was not submitted to Stock Exchange within stipulated time.	Company submitted the Annual Report for the financial year ended 31 <sup>st</sup> March, 2020 after due date.
4.	Intimation regarding violation of Regulation 5 of SEBI (Prohibition of Insider Trading) Regulations, 2015	One of the Promoters of the Company sold the shares while trading window was closed.	Company intimated to Stock Exchanges for violation.

- (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 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:

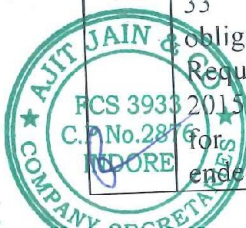
Sr. No.	Action taken by	Details of Violation	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.



1.	Stock Exchanges (BSE and NSE)	Non-Compliance of Regulation 33 of SEBI (Listing Obligation and Disclosure Requirements), 2015.	Fine was imposed by the BSE Ltd. and the National Stock Exchange of India Ltd. for late submission of Audited Financial Results for the Quarter and year ended 31 <sup>st</sup> March, 2020.	The Audited Financial Results for the Quarter and year ended 31 <sup>st</sup> March, 2020 was not submitted within due date from the end of the Financial Year. The Company submitted the request for waiver of fine arises from the damages caused in server of our company due to some technical issues resulting in loss of substantial financial data; National Stock Exchange of India Limited has considered the request and refunds the amount. However, the application of refund is pending with BSE Ltd.
2.	Stock Exchanges (BSE and NSE)	Non-Compliance of Regulation 33 of SEBI (Listing Obligation and Disclosure Requirements), 2015.	Fine was imposed by the BSE Ltd. and the National Stock Exchange of India Ltd. for late submission of Un-audited Financial Results for the Quarter ended 30 <sup>th</sup> June, 2020.	The Un-audited Financial Results for the Quarter ended 30 <sup>th</sup> June, 2020 was not submitted within due date from the end of the Financial Year.
3.	Stock Exchanges (BSE and NSE)	Non-Compliance of Regulation 34 of SEBI (Listing Obligation and Disclosure Requirements), 2015.	Fine was imposed by the BSE Ltd. and the National Stock Exchange of India Ltd. for late submission of Annual Report for the financial year ended 31 <sup>st</sup> March, 2020.	The Annual Report for the financial year ended 31 <sup>st</sup> March, 2020 was not submitted to Stock Exchange within stipulated time. The Company submitted the request for waiver of fine arises from the damages caused in server of our company due to some technical issues resulting in loss of substantial financial data and till date the request is pending with the Exchanges.

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

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the Secretarial compliance Report for the year ended....--	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	Noncompliance of Regulation 33 of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015 - The Financial Results for the Quarter and year ended 31 <sup>st</sup> March, 2019, was	For the year ended 31 <sup>st</sup> March, 2020	Financial results for the quarter and year ended 31 <sup>st</sup> March, 2019 has been submitted after due date.	Company submitted financial results for the quarter and year ended 31 <sup>st</sup> March, 2019, after due date.



	not submitted within due date.			
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(e) I have conducted online verification and examination of records, as facilitated by the Company due to Covid – 19 and subsequent lockdown situation for the purpose of issuing this Report.

Place: Indore  
Date: 17/06/2021



For Ajit Jain & Co., Company Secretaries

*A. K. Jain*

CS Ajit Jain (Proprietor)

FCS No.: 3933

C. P. No.: 2876

UDIN: **F003933C000476438**