



APIS INDIA LIMITED

18/32, East Patel Nagar, New Delhi 110 008 India
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E mail@apisindia.com W apisindia.com

AIL/CS/2022-23/256

May 20, 2022

To
The Manager,
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai-400001

BSE Scrip Code: 506166

Sub: Submission of Annual Secretarial Compliance Report pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Dear Sir/Madam,

In reference to the compliance of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI circular no. CIR/CFD/CMD1/27/2019 dated 8th February, 2019, we are enclosing herewith the Annual Secretarial Compliance Report issued by M/s. Anand Nimesh & Associates, Company Secretaries for the financial year ended March 31, 2022.

Kindly take the same on record.

Thanking You,
For APIS India Limited

Amit Anand
(Managing Director)
DIN: 00951321



Investor Email id: mail@apisindia.com

Encl: a/a

Anand Nimesh & Associates

(Company Secretaries)

183B, Gali No-8, Second Floor, Gurudwara Road

West Guru Angad Nagar, Laxmi Nagar, Delhi-110092

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ANNUAL SECRETARIAL COMPLIANCE REPORT OF APIS INDIA LIMITED FOR THE YEAR ENDED 31ST MARCH 2022

To,

The Board of Directors

APIS INDIA LIMITED

(CIN- L51900DL1983PLC164048)

18/32, East Patel Nagar,

New Delhi - 110008

We, M/s Anand Nimesh & Associates, Practicing Company Secretaries have examined:

- (a) all the documents and records made available to us and explanation provided by Apis 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 31st March, 2022 ("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 there under; and
- (b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India ("SEBI");

The specific Regulations, whose provisions and the circulars/ guidelines issued there under, 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; **(Not Applicable to the Company during the Audit Period)**



- (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; **(Not Applicable to the Company during the Audit Period)**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not Applicable to the Company during the Audit Period)**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not Applicable to the Company during the Audit Period)**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **(Not Applicable to the Company during the Audit Period)**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018
- (j) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993

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.	Filing of Financial Results for the financial year ended 31 st March, 2021 with 60 days from the end of financial year.	<i>The Company has filled its financial results for the financial year ended 31st March, 2021 with a delay of 10 days due to Severe COVID affect to Statutory auditor</i>	The Company has paid an amount of Rs. 54,000/- (net of TDS) as penalty to the BSE Limited along with detailed disclosure to the shareholders about the delay vide its letter no. AIL/CS/2020-21/204 dated August 14, 2021.



- (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/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.	NA	NIL	NA	NIL

- (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... (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
1.	NA	NIL	NA	NIL

For Anand Nimesh & Associates
(Company Secretaries)

Anand K. Singh
Anand Kumar Singh
(Partner)

M. No- F10812
COP No- 9404



UDIN: F010812D000356080

Date: 20/05/2022
Place: Delhi

This Report is to be read with our letter of even date annexed herewith and forms an integral part of this Report.

**To,
The Board of Directors
APIS INDIA LIMITED**

The Secretarial Compliance Report of even date is to be read along with this letter.

- 1) Maintenance of secretarial records under regulations, circulars and guidelines prescribed under the Securities and Exchange Board of India Act, 1992 (SEBI ACT) and the Securities Contracts (Regulation) Act, 1956 (SCRA) rules made thereunder and Regulations, circulars and guidelines issued thereunder by SEBI, is the responsibility of the management of the listed entity. Our responsibility is to express an opinion on these records based on our audit.
- 2) We have not verified the correctness and appropriateness of financial records and Books of Account of the listed entity.
- 3) Where ever required, we have obtained the Management representation about the compliance of laws, rules and regulations and happening of events etc.
- 4) The compliance of the provisions of SEBI ACT and SCRA, and regulations, circulars and guidelines prescribed thereunder, is the responsibility of management. Our examination was limited to the verification of documents and records made available to us and explanations provided to us with respect to the practices and processes followed in matters relating to this Report.
- 5) The Secretarial Compliance Report is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

**For Anand Nimesh & Associates
(Company Secretaries)**



**ANAND KUMAR SINGH
(Partner)**

M. No- F10812

COP No- 9404

UDIN- F010812D000356080

Date: 20/05/2022

Place: Delhi