

**GUJARAT APOLLO INDUSTRIES LIMITED**

"Parishram", Cellar, 5-B, Rashmi Society, Nr. Mithakhali Circle, Navrangpura, Ahmedabad-380 009, Gujarat, India. Tel. +91-79- 26444597/98, 26564705

July 31, 2020

<b>Dy. General Manager</b> <b>BSE Limited</b> Corporate Relation Department, P.J. Towers, Dalal Street, Fort, Mumbai - 400 001	<b>The Manager</b> <b>National Stock Exchange of India Limited</b> Exchange Plaza, Bandra Kurla Complex, Bandra (E), Mumbai - 400 051
<b>Scrip ID: GUJAPOIND; Scrip Code: 522217</b>	<b>Scrip Symbol: GUJAPOLLO</b>

Dear Sir/Madam,

**Subject: Submission of Annual Secretarial Compliance Report**

In terms of the provisions of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/ CIR/CFD/CMD1/27/2019 dated 8<sup>th</sup> February, 2019, please find enclosed herewith Secretarial Compliance Report of the Company issued by M/s. Ashish Shah & Associates, Company Secretaries, Ahmedabad, for the financial year ended 31<sup>st</sup> March, 2020.

Please take the same on your record.

Thanking You,

For **GUJARAT APOLLO INDUSTRIES LIMITED**



**CS Neha Chikani Shah [M'ship No:A-25420]**  
**Company Secretary and Compliance Officer**



Secretarial compliance report of GUJARAT APOLLO INDUSTRIES LIMITED for the year ended 31<sup>st</sup> March, 2020

I Ashish Shah has examined:

- (a) all the documents and records made available to me and explanation provided by GUJARAT APOLLO INDUSTRIES 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 31<sup>st</sup> March, 2020 ("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;
- (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;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

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:-



## COMPANY SECRETARY

Sr. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	Reg. 33 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.	Delay in furnishing the consolidated financial results with the Stock Exchange(s) for the quarter ended on 30.06.2019 and for the quarter ended on 30.09.2019.	Company has submitted consolidated financial results for the first quarter ended on 30.06.2019 with a delay of 22 days and paid penalty of Rs. 75000/- with BSE and 1,10,000/- with NSE.  Further the Company has submitted consolidated financial results for the second quarter ended on 30.09.2019 with a delay of 4 days and paid penalty of Rs. 20000/- with each stock exchange (BSE and NSE).

- (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.	BSE Limited and National Stock Exchange of India Ltd.	Delay in furnishing the consolidated financial results with the Stock Exchange(s) for the quarter	BSE Limited has issued notice no LIST/COMP/522217/Reg.33-June-19/164/2019-20 dated August, 30, 2019 for non-submission of financial results for the quarter ended on	Company has submitted consolidated financial results for the first quarter ended on 30.06.2019 with



	ended on 30.06.2019 and for the quarter ended on 30.09.2019.	<p>30.06.2019 and imposed penalty of Rs. 75,000/-.</p> <p>BSE Limited has also issued notice no. LIST/COMP/522217/Reg.33-Sep-19/239/2019-20 dated December 02, 2019 for non-submission of financial results for the quarter ended on 30.09.2019 and imposed penalty of Rs. 20,000/-.</p> <p>National Stock Exchange of India Limited has issued notice No. NSE/SOP/FRZ/90139 Dated September 20, 2019 for non-submission of financial results for the quarter ended on 30.06.2019 and imposed penalty of Rs. 1,10,000/-.</p> <p>National Stock Exchange of India Limited has also issued notice no. NSE/LIST-SOP/REG-33/FINES/96524 dated December 02, 2019 for non-submission of financial results for the quarter ended on 30.09.2019 and imposed penalty of Rs. 20,000/-.</p>	<p>a delay of 22 days and paid penalty of Rs. 75,000/- with BSE and 1,10,000/- with NSE.</p> <p>Further the Company has submitted consolidated financial results for the second quarter ended on 30.09.2019 with a delay of 4 days and paid penalty of Rs. 20,000/- with each stock exchange (BSE and NSE).</p>
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(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 on 31 <sup>st</sup> March, 2019 (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.	Reg. 33 of SEBI (Listing Obligations and Disclosure	Reg. 33 of SEBI (Listing Obligations and Disclosure	Company has submitted consolidated	Company has complied with the same with



# Ashish Shah & Associates

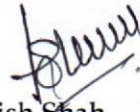
## COMPANY SECRETARY

4<sup>th</sup> Floor, Shaival Plaza,  
Near Gujarat College,  
Ellisbridge,  
AHMEDABAD-380006  
Tel. : 079-26420336/7/9  
Fax : 079-26424100  
Mobile : 9825940391  
E-mail : ashish@ravics.com

	Requirements) Regulations, 2015.	Requirements) Regulations, 2015.	financial results for the quarter / financial year ended on 31.03.2018 with the stock exchange(s) with some delay.	delay of 73 days.
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Place: Ahmedabad  
Date: 30<sup>th</sup> June, 2020

For, Ashish Shah & Associates



Ashish Shah  
Company Secretary in practice  
FCS No. 5974  
C P No.: 4178  
UDIN: F005974B000402095

