

Alum/12/2021-22

Date: 25.06.2021

The Secretary

BSE Limited

New Trading Wing,
Rotunda Building,
PJ Tower, Dalal Street,
Mumbai- 400001
Scrip Code: 539045

The Manager

National Stock Exchange of India Limited

Exchange Plaza, C-1, Block "G"
5th floor, Bandra Kurla Complex, ,
Bandra East
Mumbai- 400051
Scrip Code: MANAKALUCO

Dear Madam/Sir,

Sub: Annual secretarial Compliance Report

Please find enclosed the Annual Secretarial Compliance Report of Manaksia Aluminium Company Limited for the year ended 31st March, 2021, certified by Mr. Asit Kumar Labh, Practicing Company Secretaries dated 24th June, 2021.

This Report has been issued in terms of SEBI Circular no. CIR/CFD/CMD1/27/2019 dated February 8, 2019.

This is for your information and record.

Thanking you,

Yours faithfully,

For Manaksia Aluminium Company Limited

Vivek Jain

Vivek Jain
Company Secretary

Encl: As above





Secretarial Compliance Report of Manaksia Aluminium Company Limited
for the year ended 31st March, 2021

I, Asit Kumar Labh, *Practicing Company Secretary*, have examined:

- (a) all the documents and records made available to me and explanation provided by **Manaksia Aluminium Company Limited** (CIN : L27100WB2010PLC144405) having its Registered Office at Bikaner Building, 8/1, Lal Bazar Street, 3rd Floor, Kolkata – 700001, West Bengal (“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, 2021 (“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, as amended, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include:-

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosures Requirements) Regulations, 2015;
- (b) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (c) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (d) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;

and circulars/ guidelines issued thereunder; and based on above examination, I hereby report that, during the Review Period:



**Asit
Kumar
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by Asit Kumar
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- (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:-

Sl. No.	Compliance Requirement (Regulations/ circulars/guidelines including specific clause)	Deviations	Observations/ Remarks of the Practising Company Secretary
-	-	None	-

- (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:

Sl.No	Action taken by	Details of Violation	Details of Action taken E.g. fines, warning letter, debarment, etc.	Observations/ Remarks of the Practising Company Secretary, if any.
-	-	None	-	-

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

Sl.No	Observation of practising 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, in any	Comments of the Practising Company Secretary on the actions taken by the listed entity
-	None	-	-	-

Note: The listed entity has modified the terms of appointment of Statutory Auditor in accordance with the provisions of 6(A) and 6(B) of the SEBI Circular CIR/CFD/CMD1/114/2019 dated 18.10.2019 during the financial year under report.

Asit
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(CS ASIT KUMAR LABH)
Practicing Company Secretary
ACS – 32891 / CP No.- 14664
UDIN: A032891C000509565

Place : Kolkata
Date : 24.06.2021

