

Date: 29.06.2021

To
Listing Department
National Stock Exchange of India Limited
Exchange Plaza, Plot No. C-1, G Block,
Bandra Kurla Complex, Bandra (E)
Mumbai- 400 051
NSE Symbol: ALPHAGEO

To
Department of Corporate Services
BSE Limited
1st Floor, New Trading Ring, Rotunda Building
Phiroze Jeejeebhoy Towers, Dalal Street, Fort,
Mumbai- 400 001
BSE Scrip Code: 526397

Dear Sir,

Sub: Annual Secretarial Compliance Report for the year ended March 31, 2021

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019, we are herewith submitting the Annual Secretarial Compliance Report of the Company for the year ended March 31, 2021, issued by M/s. D. Hanumanta Raju & Co., Practicing Company Secretaries, Hyderabad.

We request you to take the above on record.

Thanking You,
For **Alpha Geo (India) Limited**



Deepa Dutta
Company Secretary & Compliance Officer



**SECRETARIAL COMPLIANCE REPORT OF
ALPHAGEO (INDIA) LIMITED
FOR THE YEAR ENDED 31.03.2021**

We, D.Hanumanta Raju & Co, Company Secretaries, having our office at B-13, F-1, P.S.Nagar, Vijayanagar Colony, Hyderabad – 500 057 have examined:

- a) all the documents and records made available to us and explanations, information and clarifications provided by **ALPHAGEO (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) declaration received from the listed entity on Annual Compliance for the year ended 31st March, 2021 (“Review Period”) in respect of compliance with the provisions of:
 1. the Securities and Exchange Board of India Act, 1992 (“SEBI Act”) and the Regulations, circulars, guidelines issued there under; and
 2. 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;
- 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; As there was no issue of Debt Securities by the company during the review period, these regulations are not applicable for the review period.



- g) Securities and Exchange Board of India (Issue and Listing of Non Convertible and Redeemable Preference Shares) Regulations, 2013; As there was no issue of Non Convertible and Redeemable Preference Shares by the company during the review period, these regulations are not applicable for the review period;
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i) 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;
- j) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018.

and circulars/ guidelines issued there under; 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 there under, except in the matters specified below

Sr. No.	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Deviations	Observations/Remarks of the Practising Company Secretary
1.	Disclosure of events or information under Regulation 30 of (Listing Obligations and Disclosure Requirements) Regulations, 2015	Intimation of revision in credit rating.	It is observed that Listed Entity has received credit rating report from CRISIL, the credit rating agency on 12.09.2020 and the same was intimated on 23.09.2020.

- (b) The Listed Entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under in so far as it appears from our examination of those records.
- (c) No actions were taken against the Listed Entity/ its promoters/ directors 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 there under



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

Sr. No	Observations of the Practising 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 Practising Company Secretaries on the actions taken by the listed entity
1.	The Listed Entity should have at least half of the Board as Independent Directors if the Chairman is an Executive Director. However, the Listed Entity does not have adequate number of Independent Directors on its Board for the quarter ended 30.09.2019 & 31.12.2019.	31 st March, 2020	The Listed Entity has appointed adequate number of Independent Directors, half of the Board of the Listed Entity comprises of Independent Directors.	The Listed Entity has appointed adequate number of Independent Directors and the composition of the Board is in compliance with Regulation 17 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.
2.	Company being in top 1000 Listed Entities w.e.f. 1 April, 2019 the Board shall comprise of Directors not less than six in number. However due to resignation of Mr. Mohana Krishna Reddy &	31 st March, 2020	Company is not in top 1000 Listed entities w.e.f 31.03.2020. However, there are six directors on the Board of the Listed entity.	As on 31.03.2020 the Company is not in top 1000 listed entities. However the company being in top 2000 Listed entities, the requirement of appointing 6 directors in



	Mr. Ashwinder Bhel on 31.07.2019 and 01.08.2019 respectively, the number of directors on the Board were less than six till 06.02.2020			Board is in compliance.
3.	The Audit Committee shall comprise of minimum Three Directors and at least Two-thirds of the members of audit committee shall be independent directors. However, due to the resignation of 2 (Two) Independent Directors there were only (2) Two Directors as members of the Committee during the quarter ended 30.09.2019.	31 st March, 2020	The listed entity has appointed adequate number of Independent Directors and the Audit Committee comprises of four directors and Two-thirds of the members of the audit committee are Independent Directors.	The Listed Entity has appointed adequate number of Independent Directors and the composition of the Audit Committee is in compliance with Regulation 18 of SEBI (Listing Obligation and Disclosure Requirement) Regulations, 2015.
4.	Nomination and Remuneration Committee had only 1 (one) Independent Director as a member of the Committee for the quarter ended 30.09.2019	31 st March, 2020	Nomination and Remuneration Committee has 3 Independent Directors as members of the Committee.	The Listed Entity has appointed adequate number of Independent Directors and the composition of the Nomination and Remuneration Committee is in



				compliance with Regulation 19 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.
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- (e) The Listed entity has complied with Clause 6(A) and 6(B) of SEBI circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019.

**Place: Hyderabad
Date: 25.06.2021**

**For D.HANUMANTA RAJU & CO
COMPANY SECRETARIES**



**CS SHAIK RAZIA
PARTNER**

**FCS: 7122, CP NO: 7824
UDIN: F007122C000512495**