



Regd Off : 301 Camps Corner , Opp SRP Group 4, Near D Mart Makarpura, Baroda 390010, Gujarat ,India. 02656569067,
CIN: L74110GJ1992PLC093816 , www.alexanderstamps.in Email rudrakshcaptech@gmail.com.

To,
The Secretary
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai – 400 001.

29th May, 2021

Scrip Code – 511463

Dear Sir/Madam,

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

Pursuant to SEBI Circular CIR/CFD/CMD1/27/2019 dated February 8, 2019, we are submitting herewith the Annual Secretarial Compliance Report of the Company for the year ended March 31, 2021, issued by M/s Kuldeep Thakkar & Associates, Practicing Company Secretaries, Vadodara.

Kindly take the same on record.

**Thanking you,
Yours faithfully,
For, Alexander Stamps and Coin Limited**

Anirudh Sethi
Manging Director
DIN: 06864789
Encl: a/a



To,
Alexander Stamps & Coin Limited
301, Camps Corner, Opp. SRP Group 4,
Near D Mart, Makarpura Road, Makarpura,
Vadodara- 390014, Gujarat, India.

Sub.: Secretarial Compliance Report of Alexander Stamps & Coin Limited for the year ended on 31st March, 2021

I have examined:

- (a) all the documents and records made available to us and explanation provided by Alexander Stamps & Coin 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 on 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, 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; **(Not applicable to the Company during the Audit period)**

- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; **(Not applicable to the Company during the Audit period)**
- (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) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018

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 rules/regulations and circulars/guidelines issued thereunder as applicable from time to time 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.	Reg.13(1) of SEBI (LODR) Regulations, 2015 relating to Non-Redressal of Investor Complaints for the period of March 11, 2021 to April 10, 2021	Yes	The Company has failed to resolve the investors' grievances/complaint within specified time period. SCORES Complaint No. SEBIE/GJ20/0001219/1 of certain shareholders within time limit and also has failed to file quarterly disclosure, as per the requirement of these regulation, within 21 days from the end of quarter.

2.	Regulation 33 of SEBI (LODR) Regulations, 2015 relating to Financial Results	Yes	The Company has failed to file First (1 st) and Second (2 nd) quarterly result for the F.Y. 2020-21 within 45 days from the end of quarter.
3.	Regulation 31 of SEBI (LODR) Regulations, 2015 relating to Holding of specified securities and shareholding pattern	Yes	The company has failed to file First (1 st) quarterly statement within 21 days from the end of quarter (i.e. on or before 21-07-2020). However, the statement has been filed on 24-07-2020.
4.	Regulation 6 of SEBI (LODR) Regulations, 2015 & Regulation 9 of SEBI (PIT) Regulations, 2015 relating to Compliance Officer	Yes	The company has failed to appoint Compliance Officer within 6 months from the resignation of CS Jigar Ray, Past Compliance Officer (resigned from 31-01-2020). However, the Company has appointed Ms. Nishi Jaiswal as Compliance Officer w.e.f. 02-02-2021.
5.	Regulation 24A read with circular CIR/CFD/CMD1/27/2019 dated February 08, 2019	Yes	The company has failed to file Annual Secretarial Audit Report with stock exchange within 60 days from the end of financial year 2019-20 (i.e. on or before 30-05-2020).
6.	Regulation 40 (9) of SEBI (LODR) Regulations, 2015 relating to requirement of producing certificate from PCS (who will certifying all certificates have been issued within thirty days of the date of lodgement for transfer, sub-division, consolidation, renewal, exchange or endorsement of calls/allotment monies), within one month, from the end of each half year.	Yes	The company has failed to produce such certificate for the period from 1 st April, 2020 to 30 th September, 2020, within 1 month from the end of half year (i.e. on or before 31-10-2020). However, the certificate has been produced on 11 th November, 2020.
7.	Regulation 47 of SEBI (LODR) Regulations, 2015, Advertisements in Newspapers	Yes	The company has not advertised the following information: (a) Notice of board meeting, where financial results shall be discussed; (b) Financial results; (c) Notices given to shareholders by advertisement.

8.	Regulation 29 of SEBI (LODR) Regulations, 2015, Notice for Board Meeting	Yes	The Company has failed to intimate the date of the Board Meeting to the Stock Exchange within time limit i.e. at least 5 days in advance for Board Meeting intimation in which Financial results is going to be approve.
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- (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) There are no 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.
- (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 31st March, 2020 (FY 2019-20)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	Appointment of Key managerial personnel as required under Sec 203 of the Companies Act, 2013.	It is observed that the company has not appointed Managing Director, Chief Financial Officer, during the financial year ended on 31-03-2020. However, statutory compliances are guided by the corporate law advisor.	The Company has appointed the required Key-manual personnel as required under the law, during the FY 2020-21.	As per Section 203 of the C A, 2013 read with the LODR, 2015, the Company shall appoint KMPs and Compliance Officer. In consonance with the same, the Company has appointed the same during the FY 2020-21.
2.	Compliance of the Listing Requirements	The company has delayed in filing the compliances under the listing Agreement, Companies Act, 2013. However, the filings are affected in terms of LODR may be lacking in accordance with the resources base spirit reflected in the listing requirements. Like,	The management of the Company has tried its best to comply with LODR, 2015 requirements within specified timelines.	Pursuant to the Listing requirements, the company is required to disclose certain matters through Newspaper advertisements. The company has failed to do so. Said disclosure includes periodical financial results,

		Newspaper advertisements, etc.		notice of meeting of the board of directors where financial results shall be discussed, Notice given to shareholders, and other disclosures as mentioned under Reg. 47 and 75.
3.	Maintenance of the statutory records, registers, books with updation under the various provisions of Companies Act, 2013 & Governing Rules.	It is observed that the company has not updated the registers, records, minutes, books under the various provisions of the Companies Act, 2013 and rules framed there under. Relevant to FY 2019-20 including the Minutes of board meeting and meeting of the General meeting of members.	With the support of professional and inhouse legal team, the Company has updated all the secretarial records required under the statutory rules and regulations.	As per the provisions of Companies Act, 2013 read with its rules, the Company has maintained and updated all the secretarial records.

Place: Vadodara
Date: 29th May 2021

For, Kuldip Thakkar & Associates
Company Secretaries

CS Kuldip Thakkar
Proprietor
ACS No.: A46964
C P No.: 22442
UDIN: 46964C000390494