



APIS INDIA LIMITED

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AIL/CS/2019-20/74

May 15, 2018

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

Scrip Code: 506166

Subject: Submission of Annual Secretarial Compliance Report vide SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019 for the year ended 31st March, 2019.

Dear Sir,

In pursuant to SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019, all listed entities are required to submit to the Stock Exchanges within 60 days from the end of the financial year, Annual Secretarial Compliance Report, issued by a Practicing Company Secretary based on a check of the compliance by such listed entity with the applicable SEBI Regulations and circulars/guidelines issued thereunder.

Accordingly, we are attaching herewith the Annual Secretarial Compliance Report of APIS India Limited issued by Anand Nimesh & Associates, Practicing Company Secretaries dated May 15, 2019, for the financial year ended 31st March, 2019.

Kindly take the same on record.

Thanking you,
For APIS India Limited

Amit Anand
(Managing Director)
DIN: 0951321



Encl: a/a



Anand Nimesh & Associates

(Company Secretaries)

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SECRETARIAL COMPLIANCE REPORT OF APIS INDIA LIMITED FOR THE YEAR ENDED 31ST MARCH 2019

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

- all the documents and records made available to us and explanation provided by Apis India Limited ("the listed entity"),
- the filings/ submissions made by the listed entity to the stock exchanges,
- website of the listed entity,
- any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31st March 2019 ("Review Period") in respect of compliance with the provisions of:

- the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued there under; and
- 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:-

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; N.A
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; N.A



- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **N.A**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **N.A**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **N.A**
- (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, I/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.	NA	NIL	NA

- (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- 24881
COP No- 9404



Date: May 15, 2019
Place: Delhi