



Date: 25th May 2020

To, Manager - Department of Corporate Services BSE Ltd Phiroze Jeejeebhoy Towers, Dalal Street, Fort, Mumbai - 400 001 Scrip Code: 523694	To, The Manager - Listing Department, The National Stock Exchange of India Ltd Exchange Plaza, Plot No. C/1, Block G, Sandra - Kurla Complex, Sandra (East), Mumbai - 400 051 Symbol: APCOTEXIND
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Sub: Annual Secretarial Compliance Report for the year ended 31st March 2020

Dear Sir/Madam,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1//27/2019 dated February 8, 2019, please find enclosed the annual secretarial compliance report of the company for the year ended 31st March 2020.

This is for your information and records.

Thanking you,

For Apcotex Industries Limited

Anand V Kumashi
GM – Finance & Company Secretary

apcotex industries limited

REGD. OFFICE : 49-53, 3rd Floor, Mahavir Centre, Plot No. 77, Sector-17, Vashi, Navi Mumbai-400703, Maharashtra, India Tel:+91-22-27770800
CORPORATE OFFICE : NKM International House, 178 Backbay Recl., B. M. Chinai Marg, Mumbai-400020, Maharashtra, India. Tel:+91-22-22838302/04
TALOJA PLANT : Plot No. 3/1, MIDC Industrial Area, Taloja-410208, Dist-Raigad, Maharashtra, India. Tel:+91-22-27403500 Fax:+91-22-27412052
CIN NO. L99999MH1986PLC039199 Website:www.apcotex.com

D.S. Momaya & Co.

Company Secretaries

Office No.11, Shree Durga Apartment, Plot No.186,

Sector -10, Sanpada, Navi Mumbai- 400705

Tele ☎: 022-27756137, Mobile: 09619745928

✉Email: divya.dsmco@gmail.com,

Website: www.dsmco.co.in

Secretarial Compliance Report of Apcotex Industries Limited

For the financial year ended 31st March 2020

[Pursuant to SEBI Circular CIR/CFD/CMD1/27/2019 dated February, 08, 2019]

To

Apcotex Industries Limited

49-53, Mahavir Centre, Sector 17,

Vashi Navi Mumbai

Thane 400703.

We have examined:

- (a) All the documents and records made available to us and explanation provided by Apcotex Industries Limited [hereinafter called as 'the listed entity'],
- (b) the filings/ submissions made by the listed entity to the stock exchanges – BSE & NSE,
- (c) website of the listed entity i.e www.apcotex.com
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification, for the year ended 31st March,2020 [hereinafter called as '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 during the review period**
- (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; **Not Applicable during the review period.**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **Not Applicable during the review period.**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Not Applicable during the review period.**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **Not Applicable during 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.

and circulars/ guidelines issued there under wherever applicable.

And based on the above examination, we hereby report that, during the ReviewPeriod:

- (a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder,
- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far as it appears from my/our examination of those records.

- (c) No action was 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 thereunder: The Listed Entity do not have any subsidiary during the review period.
- (d) As there were no observations, the listed entity was not required to take any action on any of observations of the previous reports.

Date: 21st May 2020

Place: Navi Mumbai

UDIN:F007195B000278422

For D. S. Momaya & Co.
Company Secretaries

CS Divya Momaya
Proprietor
Membership No.7195
C.P. No.: 7885