

19<sup>th</sup> May 2025

To, Manager - Department of Corporate Services BSE Limited Phiroze Jeejeebhoy Towers, Dalal Street, Fort, Mumbai - 400 001  Scrip Code: 523694	To, The Manager - Listing Department, The National Stock Exchange of India Limited Exchange Plaza, Plot No. C/1, Block G, Bandra - Kurla Complex, Bandra (East), Mumbai - 400 051  Symbol: APCOTEXIND
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**Dear Sir/ Madam,**

**Subject: Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March 2025**

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed the Annual Secretarial Compliance Report of the Company for the financial year ended 31<sup>st</sup> March 2025.

This is for your information and records.

Thanking you,

**For Apcotex Industries Limited**

**Drigesh Mittal**  
**Head - Company Secretary & Legal**

**REGISTERED OFFICE**

C-403/404, 4th Level, Wing C,  
Tower I, Seawoods Grand Central,  
Sector 40, Navi Mumbai - 400706  
Maharashtra, India

T : +91-022-62060800

**CORPORATE OFFICE**

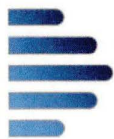
NKM International House, 178, Backbay  
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T : + 91 22 2283 8302/04

**TALOJA FACTORY**

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Taloja, Dist. Raigad 410208  
Maharashtra, India

T : + 91 22 2740 3500



# DSMCO

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**Secretarial Compliance Report  
of Apcotex Industries Limited  
For the financial year ended 31st March 2025**

To,  
**Apcotex Industries Limited**  
C-403/404, 4th Level, Wing C, Tower 1,  
Seawoods Grand Central, Sector 40, Navi Mumbai,  
Darave, Thane, Maharashtra, India, 400706.

We have examined:

- (a) all the documents and records made available to us and explanation provided by Apcotex Industries Limited (CIN:L99999MH1986PLC039199) [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,
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this report, for the financial year ended 31st March 2025 [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; **(Not Applicable during the review period)**

**Regd. Address : Office No.207, Building 3, Sector III, Millenium**

**Business Park, Mahape, Navi Mumbai, Maharashtra 400710**

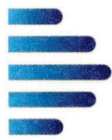
**Email : divya.dsmco@gmail.com | Mob. : 7304145928**

**Website: www.dsmco.co.in**

***D. S. Momaya & Co. LLP***

**Company Secretaries**

**LLPIN : ABB-3110**



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- (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 and Sweat Equity) Regulations, 2021; **(Not Applicable during the review period)**
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **(Not Applicable during the review period)**
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

and circulars/ guidelines issued there under wherever applicable.

Further in terms of SEBI Circular no SEBI/HO/CFD/CFD-PoD-2/CIR/P/2024/185 dated December 31, 2024 with respect to requirement of disclosure of Employee Benefit Scheme Documents in terms of regulation 46(2)(za) of Listing Regulations- Not Applicable;

and based on the above examination we hereby report that, during the review period the Compliance status of the listed entity is appended as below:

(a) The listed entity has complied with the provisions of the above Regulations and circulars/guidelines issued thereunder, except in respect of matters as specified below: Not Applicable

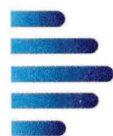
(b) The listed entity has taken following actions to comply with the observations made in previous reports: Not Applicable

(c) We hereby report that, during the review period the Compliance status of the listed entity is appended as below:

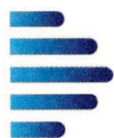
Sr. No	Particulars	Compliance Status	Observations/ Remarks by PCS
1.	<u>Secretarial Standard:</u>  The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI)	Yes	-
2.	<u>Adoption and timely updation of the Policies:</u>  • All applicable policies under SEBI	Yes	-



	<p>Regulations are adopted with the approval of board of directors of the listed entities</p> <ul style="list-style-type: none"> <li>• All the policies are in conformity with SEBI Regulations and has been reviewed &amp; timely updated as per the regulations/circulars/guidelines issued by SEBI</li> </ul>	Yes	-
3.	<p><u>Maintenance and disclosures on Website:</u></p> <ul style="list-style-type: none"> <li>• The Listed entity is maintaining a functional website.</li> <li>• Timely dissemination of the documents/information under a separate section on the website.</li> <li>• Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re-directs to the relevant document(s)/section of the website.</li> </ul>	<p>Yes</p> <p>Yes</p> <p>Yes</p>	- - -
4.	<p><u>Disqualification of Director:</u></p> <p>None of the Director of the Company are disqualified under Section 164 of the Companies Act, 2013 as confirmed by the listed entity</p>	Yes	-
5.	<p><u>Details related to Subsidiaries of listed entities have been examined w.r.t.:</u></p> <p>(a) Identification of material subsidiary companies</p> <p>(b) Requirements with respect to disclosure of material as well as other subsidiaries</p>	<p>(a) N.A.</p> <p>(b) N.A.</p>	Listed entity does not have any subsidiary company.
6.	<p><u>Preservation of Documents:</u></p> <p>The listed entity is preserving and maintaining records as prescribed Under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.</p>	Yes	-

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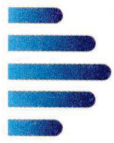
7.	<u>Performance Evaluation:</u>  The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations	Yes	-
8.	<u>Related Party Transactions:</u>  (a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions (b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved /ratified /rejected by the Audit committee	(a) Yes  (b) Yes	-  -
9.	<u>Disclosure of events or information:</u>  The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.	Yes	-
10.	<u>Prohibition of Insider Trading:</u>  The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	Yes	-



11.	<u>Actions taken by SEBI or Stock Exchange(s), if any:</u>  No Actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder	Yes	
12.	<u>Resignation of statutory auditors from the listed entity or its material subsidiaries</u>  In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and / or its material subsidiary(ies) has/have complied with paragraph 6.1 and 6.2 of section V-D of chapter V of the Master Circular on compliance with the provisions of the Listing Regulations by listed entities.	N.A.	No such event during the period under review.
13.	<u>Additional Non-compliances, if any:</u>  No any additional non-compliance observed for all SEBI regulation/circular/guidance note etc.	N.A.	No such non-compliances during the period under review.

**Assumptions & Limitations of Scope and Review:**

1. Compliance with the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to certify based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial Records and Books of Accounts of the listed entity.
4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the Listing Regulations and is neither an assurance as to



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the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

**For D.S. Momaya & Co. LLP  
Company Secretaries  
FRN No. L2022MH012300**

DIVYA  
SAMEER  
MOMAYA

Digitally signed by  
DIVYA SAMEER  
MOMAYA  
Date: 2025.05.07  
16:10:36 +05'30'

**CS Divya Momaya  
Designated Partner  
FCS No. 7195, CP No.7885**

**Date: 07/05/2025  
Place: Navi Mumbai  
UDIN: F007195G000289422**