



4th May 2019

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| To, The Manager - Listing Department, The National Stock Exchange of India Ltd Exchange Plaza, 5th floor, Plot no. C/1, "G" Block, Bandra-Kurla Complex, Mumbai-400051 Symbol: APCOTEXIND | To, Manager-Department of Corporate Services BSE Limited Jeejeebhoy Towers, Dalal Street, Fort, Mumbai - 400 001 Security Code: 523694 |
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Dear Sir,

Sub: Annual Secretarial Compliance Report for the year ended 31ST March 2019

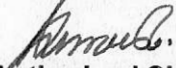
Ref: SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019.

Please find enclosed herewith the annual secretarial compliance report for the year ended 31st March 2019, issued by Mr. Mahesh Hurgat, Practicing Company Secretaries, Secretarial Auditor of the Company.

Thanking you,

Yours faithfully,

For Apcotex Industries Limited


Authorized Signatory

apcotex industries limited

TALOJA PLANT : Plot No. 3/1, MIDC Industrial Area, Talaja-410 208, Dist-Raigad, Maharashtra, India. Tel:+91-22-27403500 Fax:+91-22-27412052

CORPORATE OFFICE : NKM International House, 178, Backbay Recl., B. M. Chinai Marg, Mumbai-400 020, Maharashtra, India. Tel:+91-22-22838302/04.

CIN NO. L99999MH1986PLC039199 Website:www.apcotex.com

MAHESH HURGAT

COMPANY SECRETARY

5, ARYAVRAT, OPP. AGARWAL HALL, MANPADA ROAD, DOMBIVALI (E),
PIN-421201

Contact :- (M) 9869436944

Mail mkhurgat@gmail.com

SECRETARIAL COMPLIANCE REPORT

OF APCOTEX INDUSTRIES LIMITED

For the financial year ended 31st March 2019

[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 Maharashtra.

I 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,
- (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 31st March,2019 [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");

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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.**
- (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 thereunder wherever applicable;

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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 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 insofar 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) This being first report issued under the relevant circular and therefore I am unable to provide any comment about action(s) taken by the listed entity to comply with any observation(s) made in previous report(s).

Place: Mumbai
Date:24/04/2019

MAHESH HURGAT
PRACTISING COMPANY SECRETARY
ACS NO.: 7139 C. P. NO.: - 2498