

ALOK INDUSTRIES LIMITED

Peninsula Business Park, Tower B, 2nd & 3rd Floor, Ganpatrao Kadam Marg, Lower Parel,
Mumbai - 400 013. Tel.: 91 22 6178 7000 Fax : 91 22 6178 7118



30th May, 2022

BSE Limited

Listing Department,
P.J. Towers, Dalal Street,
Mumbai - 400 001
Fax No.: 2272 2037 / 2272 2039

National Stock Exchange of India Limited

Exchange Plaza, 5th Floor,
Plot no. C/1, G Block,
Bandra-Kurla Complex,
Bandra (East), Mumbai - 400 051
Fax No.: 2659 8237 / 2659 8238

Scrip Code: 521070

Symbol: ALOKINDS

Dear Sir/Madam,

Sub: Compliance under Regulation 24(A) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations")

Pursuant to Regulation 24(A) of the Listing Regulations, we enclose herewith the Annual Secretarial Compliance Report duly issued by Mr. Virendra G. Bhatt, Practising Company Secretary, for the Financial Year ended 31st March, 2022.

Please take the same on record.

Thanking you,

Yours faithfully,

For Alok Industries Limited

Hanav

Hitesh Kanani
Company Secretary & Compliance Officer
Membership No. F6188



Encl: As Above

Virendra Bhatt

Company Secretary

Office :

Office No. 03, A Wing, 9th Floor,
Pinnacle Corporate Park,
BKC CST Link Rd., MMRDA Area,
Bandra Kurla Complex,
Bandra East, Mumbai - 400 051.

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SECRETARIAL COMPLIANCE REPORT OF THE ALOK INDUSTRIES LIMITED FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2022

1. I, Virendra G. Bhatt, Practicing Company Secretary, have examined:

- (a) all the documents and records made available to me and explanation provided by the **Alok Industries Limited** having CIN: **L17110DN1986PLC000334** ("the listed entity") arising from the compliances of specific Regulations listed under Clause 2 of this report;
- (b) the filings or submissions made by the Listed Entity to the stock exchanges in connection with the above;
- (c) website of the Listed Entity; and
- (d) all other documents, fillings or submission on the basis of which this certification is given,

for the financial year ended 31st March, 2022 ("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");
- ### 2. The specific Regulations, whose provisions and the Circulars / Guidelines issued thereunder, have been examined, include:-

- (a) The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;



- (b) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (c) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) The 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) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (h) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- (i) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client - (Not applicable during the review period);

and based on the above examination, I hereby report that, during the Review Period:

- (a) The Listed Entity has complied with the applicable provisions of the above Regulations and circulars / guidelines issued thereunder, except in respect of the matters specified below:

Sr. No.	Compliance Requirement (Regulations / circulars / guidelines including specific clause)	Deviations	Observations / Remarks of the Practicing Company Secretary
-	-	-	-

- (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 examination of those records.



- (c) The following are the details of actions taken against the listed entity / its promoters / directors either by the SEBI or by the 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.
-	-	-	-	-

- (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 31 st March, 2021	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
-	-	-	-	-

Note: The observations made in the Annual Secretarial Compliance Report for the financial year ended 31st March, 2020 were already mentioned in the previous year's report (i.e. report for the financial year ended 31st March, 2021) and no action was required to be taken in current year.

- (e) The Securities and Exchange Board of India vide its Adjudication Order No.: Order/SR/SM/2020-21/8433/47 dated 30th July, 2020 imposed penalty of Rs. 12,00,000/- on the Company. The Company challenged the said order before the Securities Appellate Tribunal ('SAT') Mumbai and SAT vide its order dated 1st December, 2020 quashed the Order of the AO of the SEBI. SEBI filed the Civil Appeal before the Hon'ble Supreme Court of India challenging the Order dated 1st December, 2020 passed by the Hon'ble SAT quashing and setting aside the order passed by the AO of the SEBI for imposing cost of Rs. 12,00,000/- on the Company. The said matter was pending before the Hon'ble Supreme Court as on 31st March, 2022.



(f) I have partially conducted online verification and examination of records, as facilitated by the Company due to the prevailing conditions owing to Covid-19 for the purpose of issuing this Certificate.

Date: 14th April, 2022

Place: Mumbai

UDIN: A001157D000126073



Virendra G. Bhatt

Practicing Company Secretary

ACS No.: 1157 / COP No.: 124

Peer Review Cert. No.: 1439/2021