

**SECRETARIAL COMPLIANCE REPORT OF ANIK
INDUSTRIES LIMITED****FOR THE YEAR ENDED 31.03.2023***(Pursuant to SEBI Circular CIR/CFD/CMD1/27/2019 dated February 08, 2019 and BSE Circular 20230410-41 and NSE Circular NSE/CML/ 2023/30 dated April 10, 2023)*

We have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by **M/s Anik Industries Limited (CIN: L24118MH1976PLC136836)** (hereinafter referred as 'the listed entity'), having its Registered Office at 610, Tulsiani Chambers, Nariman Point, Mumbai MH 400021 IN. Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing our opinion thereon.

Based on our verification of the listed entity's books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Review, we hereby report that in our opinion, the listed entity has, during the review period covering the financial year ended on March 31, 2023, complied with the statutory provisions listed hereunder and also that the listed entity has proper Board processes and compliance mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

We, **AJIT JAIN & CO., Practicing Company Secretary** have examined:

- (a) all the documents and records made available to us and explanation provided by **Anik Industries Limited (CIN: L24118MH1976PLC136836)** ("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, 2023** 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; **(Which is not applicable on the company during 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; **(Which is not applicable on the company during review period);**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Which is not applicable on the company during review period);**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Which is not applicable on the company during review period);**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **(Which is not applicable on the company during review period);**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009; **(Which is not applicable on the company during review period)**

and circulars/ guidelines issued thereunder,

We hereby report that, during the Review Period the compliance status of listed entity is appended below:

S. No.	Particulars	Compliance Status (Yes/No/NA)	Observation/Remarks by PCS*
1.	<p>Secretarial Standards:</p> <p>The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.</p>	Yes	None
2.	<p>Adoption and timely updation of the Policies:</p> <ul style="list-style-type: none"> • All applicable policies under SEBI Regulations are adopted with the approval of board of 	Yes	None



	<p>directors of the listed entities</p> <ul style="list-style-type: none"> All the policies are in conformity with SEBI Regulations and have been reviewed & updated on time, as per the regulations/circulars/guidelines issued by SEBI. 	Yes	None
3.	<p>Maintenance and disclosures on Website</p> <ul style="list-style-type: none"> The Listed entity is maintaining a functional website Timely dissemination of the documents/information under a separate section on the website 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. 	Yes Yes Yes	None None None
4.	<p>Disqualification of Director:</p> <p>None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.</p>	Yes	None
5.	<p>Details related to Subsidiaries of listed entities have been examined w.r.t.:</p> <p>(a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries.</p>	Yes Yes	None None
6.	<p>Preservation of Documents:</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	None
7.	<p>Performance Evaluation:</p> <p>The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.</p>	Yes	None
8.	<p>Related Party Transactions:</p>	Yes	Prior Approval was taken for all Related



	<p>(a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or</p> <p>(b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.</p>	NA	Party Transactions.
9.	<p>Disclosure of events or information:</p> <p>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.</p>	Yes	None
10.	<p>Prohibition of Insider Trading:</p> <p>The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.</p>	Yes	None
11.	<p>Actions taken by SEBI or Stock Exchange(s), if any:</p> <p>No action(s) has been 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 except as provided under separate paragraph herein (*).</p>	No	<p>Fine was imposed by the National Stock Exchange of India Ltd. for late submission of un-audited Financial Results for the quarter ended September 30, 2022. (Delayed by One day)</p>
12.	<p>Additional Non-compliances, if any:</p> <p>No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.</p>	Yes	<p>No additional non-compliance were observed for any SEBI regulation/ circular/guidance note etc. during the year under review.</p>



COMPLIANCES RELATED TO RESIGNATION OF STATUTORY AUDITORS FROM LISTED ENTITIES AND THEIR MATERIAL SUBSIDIARIES AS PER SEBI CIRCULAR CIR/CFD/CMD1/114/2019 DATED OCTOBER 18, 2019:

No event relating to resignation of auditor has occurred during the review period; hence, this clause is not applicable.

(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:

S. No	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of violation	Fine Amount	Observations/Remarks of the Practicing Company secretary	Management Response	Remark
1.	SEBI (Listing obligations and Disclosure Requirements) Regulation, 2015	Regulation 33	The Financial Results for the quarter ended September 30, 2022 approved in the Board Meeting held on 14.11.2022 was not submitted with Stock Exchange within time.	The National Stock Exchange of India (NSE)	Fine	Non-Compliance of Regulation 33 of SEBI (Listing Obligations and Disclosure Requirements), 2015.	Rs. 5900/- (Including GST of Rs. 900/-)	The Financial Results for the quarter ended September 30, 2022 was not submitted within due time after approval in Board Meeting.	The submission of Financial Results for the quarter ended September 30, 2022 was got delayed by only one day due to some technical glitch/errors at NSE India website.	The Company has submitted the clarification for the delay and reply of the NSE is still awaited as the submission of Financial Results was got delayed by only one day due to some technical glitch/errors at NSE India website.



(b) The listed entity has taken the following actions to comply with the observations made in previous reports:

S. No.	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of violation	Fine Amount	Observations/Remarks of the Practising Company secretary	Management Response	Remark
1.	SEBI (Listing obligations and Disclosure Requirements) Regulation, 2015	Regulation 33	The outcome of Audited Financial Results for the Quarter and year ended 31st March, 2021 was not submitted within time.	Stock Exchanges (BSE and NSE)	Fine	Non-Compliance of Regulation 33 of SEBI (Listing Obligations and Disclosure Requirements), 2015.	Rs. 5,900/- from BSE and Rs. 5,900/- from NSE (Including GST)	Company submitted outcome of Audited Financial Results for the Quarter and year ended 31st March, 2021 after thirty minutes.	The Audited Financial Results for the Quarter and year ended 31st March, 2021 was not submitted within due time from the end of the Financial Year.	Company paid penalty amount to Stock Exchanges (BSE and NSE)
2.	SEBI (Prohibition of Insider Trading) Regulations, 2015	Regulation 5	One of the Promoters of the Company sold the shares while trading window was closed.	Company	Letter issued for Clarification	Non-compliance of SEBI (Prohibition of Insider Trading) Regulations, 2015	-	Company intimated to Stock Exchanges for violation.	Company intimated to Stock Exchanges for violation.	Company issued letter to promoter for clarification and also intimated to stock exchanges for violation.
3.	SEBI (Prohibition of Insider Trading)	Regulation 5	One of the Promoter's	Company	Letter issued for	Non-compliance of SEBI	-	Company intimated to Stock Exchange	Company intimated to Stock Exchange	Company issued letter to promoter



Regulations, 2015		liquidators of the company sold the shares while trading window was closed.		Clarification	(Prohibition of Insider Trading) Regulations, 2015.		s for violation.	s for violation.	for clarification and also intimated to stock exchanges for violation.
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Assumptions & Limitation of scope and Review:

1. Compliance of 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 SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and is neither an assurance as to 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.

Date: 13/05/2023
Place: Indore



For Ajit Jain & Company
(Practicing Company Secretary)

A. K. Jain

CS Ajit Jain
Proprietor

COP No.: 2876 & FCS No.: 3933

UDIN: F003933E000303100

Peer Review Certificate No. 767/2020

PCS Unique ID No.: S1998MP023400