

Aptech Limited Regd. office: Aptech House A-65, MIDC, Moroi, Andheri (E), Mumbai - 400 093. T: 91 22 2827 2300 F: 91 22 2827 2399 www aptech-worldwide corn

29th May 2023

To, BSE Limited 25th Floor, P J Towers, Dalal Street, Mumbai – 400 001 Scrip Code: 532475 To, National Stock Exchange of India Limited Exchange Plaza, Plot no. C/1, G Block, Bandra-Kurla Complex Bandra (E), Mumbai - 400 051. Symbol: APTECHT

Dear Sir/Madam,

Sub: Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015.

Pursuant to Regulation 24A of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015, as amended, we enclose herewith the Annual Secretarial Compliance Report for the year ended March 31, 2023 issued by M/s S G & Associates, Practicing Company Secretaries.

This is for your information and record.

Thanking you,

Yours faithfully,

For Aptech Limited

A.K Biyani Company Secretary Place: Mumbai

Secretarial Compliance Report

SG & ASSOCIATES Company Secretaries

Aptech Limited

For the Financial Year ended March 31, 2023.

We S G & Associates, Practicing Company Secretary have examined:

(a) All the documents and records made available to us and explanation provided by Aptech Limited ("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 31-03-2023 ("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 there under; and

(b) The Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India ("SEBI");

The specific Regulations, whose provisions and the circulars/ guidelines issued there under, 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.

(e) The Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021;

(f) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; - Not Applicable.

(g) The Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; Not Applicable.

(h) The 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; Not Applicable.

(j) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021 - Not Applicable.





(k) The Securities and Exchange Board of India (Mutual Funds) Regulations, 1996. Not Applicable.

SG & ASSOCIATES Company Secretaries

(1) The Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 Not Applicable.

(m) The Securities and Exchange Board of India (Depositories and Participants) Regulation, 1996

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

Sr.	Particulars	Compliance	Observations/Remarks
No.		Status (Yes/No/NA)	by PCS*
1.	Secretarial Standards: The compliances of the listed entity are in accordance with theapplicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI)	Yes	NA
2.	Adoption and timely updation of the Policies:	Yes	NA
	• All applicable policies under SEBI Regulations are adopted with the approval of board of Directors of the listed entities. All the policies are in conformity with SEBI Regulations and has been reviewed & timely updated as per the Regulations/ Circulars/ Guidelines Issued by SEBI.		
3.	Maintenance and disclosures on Website: • The Listed entity is maintaining a functional website	Yes	NA
	• Timely dissemination of the documents/ information under a separate Section on the website Web-links provided in Annual Corporate governance reportsunder Regulation 27(2) are accurate and specific which re- directs to the relevant document(s)/ section of the Website		
4.	Disqualification of Director: None of the Director of the Company are disqualified under Section164 of Companies Act, 2013	Yes	NA
5.	ToexaminedetailsrelatedtoSubsidiaries of listed entities:(a) Identificationofmaterialsubsidiary companiesRequirements with respect to disclosureofmaterialaswellasothersubsidiaries	Yes	NA
6.	Preservation of Documents:	Yes	NA



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	The listed entity is preserving and		
	maintaining records as prescribed under		
	SEBI Regulations and disposal of records		
	asper Policy of Preservation of		
	Documents and Archival policy prescribed		
	under SEBI LODR Regulations, 2015.		
7.	Performance Evaluation:	Yes	NA
	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		
8.	Related Party Transactions:		
	(a) The listed entity has obtained	Yes	NA
	prior approval of Audit Committee for		
	all Related party transactions		
	In case no prior approval obtained, the		
	listed entity shall provide detailed	NA	
	reasons along with confirmation whether		
	the transactions were		
	subsequently approved/ ratified/		
	rejected by the Audit committee		
9.	Disclosure of events or information:	Yes	NA
2.	The listed entity has provided all the	163	1975
	required disclosure(s)under Regulation		
	30 along with Schedule III of SEBI LODR		
	Regulations, 2015 within the time limits		
	prescribed thereunder.		
10.	Prohibition of Insider Trading:	Yes	Violation under
	The listed entity is in compliance with	100	Securities and
	Regulation 3(5) & 3(6) SEBI (Prohibition		Exchange Board of
	of Insider Trading) Regulations, 2015		India (Prohibition
			of Insiders Trading)
			Regulation, 2015 by
			the Designed Person
			by selling shares
			during the closure
			of trading window.
			of clading window.
			The following
			Designated person
			were penalized:
			1. Kallol
			Mukherjee
			2. Neeraj Malik
			3. Vikas Jain
			. VINUS UNIT
			On receipt of the
			information about
			the violation of PIT
			Regulation and
			confirmation by the
			5500

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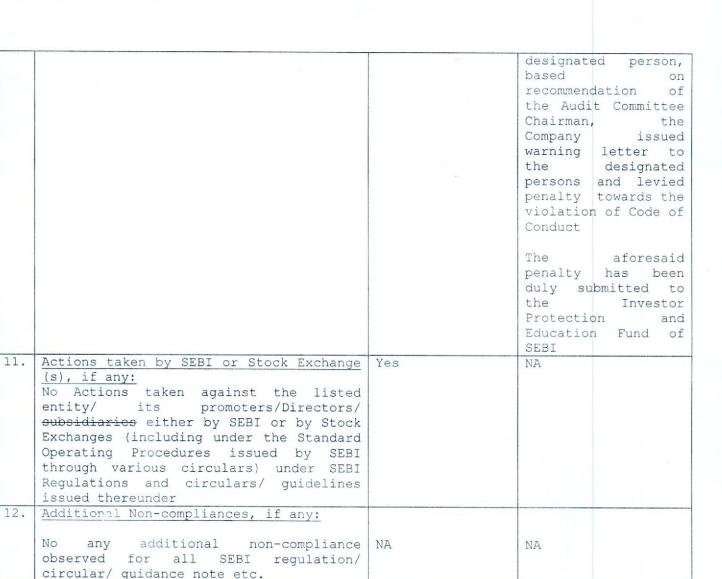
SG & ASSOCIATES Company Secretaries



E-mail : suhas62@yahoo.com
 E-mail : sg.sgfirm@gmail.com
 +91 98200 57999

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Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019

Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations /Remarks by PCS*
1.	1. Compliances with the following cond an auditor	itions while appoin	ting/re-appointing
	i. If the auditor has resigned within 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter; or	NA	NA

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ii. If the auditor has resigned after 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter as well as the next quarter; or	NA	NA
<pre>iii. If the auditor has signed the limited review/ audit report for the first three quarters of a financial year, the auditor before such resignation, has issued the limited review/ audit report for the last quarter of such financial year as well as the audit report for such financial year.</pre>		NA
Other conditions relating to resignation of	of statutory auditor	
i. Reporting of concerns by Auditor with	NA	NA
respect to the listed entity/its material subsidiary to the Audit Committee:		
a. In case of any concern with the management of the listed entity/material subsidiary such as non-availability of information / non-cooperation by the management which has hampered the audit process, the auditor has approached the Chairman of the Audit Committee of the listed entity and the Audit Committee shall receive such concern directly and immediately without specifically waiting for the quarterly Audit Committee meetings.	NA	NA
b. In case the auditor proposes to resign, all concerns with respect to the proposed resignation, along with relevant documents has been brought to the notice of the Audit Committee. In cases where the proposed resignation is due to non-receipt of information / explanation from the company, the auditor has informed the Audit Committee the details of information / explanation sought and not provided by the management, as applicable.		NA
c. The Audit Committee / Board of Directors, as the case may be, deliberated on the matter on receipt of such information from the auditor	NA	NA

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	relating to the proposal to resign as mentioned above and communicate its views to the management and the auditor ii. Disclaimer in case of non-receipt of information: The auditor has provided an appropriate disclaimer in its audit report, which is in accordance with the Standards of Auditing as specified by ICAI / NFRA, in case where the listed entity/ its material subsidiary has not provided information as required by the auditor.	NA	NA
3.	The listed entity/ its material subsidiary has obtained information from the Auditor upon resignation, in the format as specified in Annexure- A in SEBI Circular CIR/ CFD/CMD1/114/2019 dated 18th October, 2019.	NA	NA

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a) The listed entity has complied with the provisions of the above Regultions and circulars/ guidelines issued there under, except in respect of matters specified below: -

Sr.	Compliance	Regula	Deviations	Action	Type of	Details	Fine	Observatio	Managem	-
	Requirement	tion/C		Taken by	Action	of	Amount	ns/Remarks	ent	Re
No.	(Regulation	ircula				Violation		of the	Respons	ma
	s/circulars	r No.						Practicing	е	rk
	1							Company		S
	guidelines							Secretary		
	including							-		
	Specific									
	clause)									
1.	Regulation	23	Non	The	Non	Non	64,900	The	The	NA
			Submission	Company	Submission	Submissio		Company	penalty	
			of Related	has filed	lof	n of		has	has been	
			Party	its	Regulation	Related		submitted	paid by	-
			Disclosure	Regulatio	23(2) of	Party		Regulation	the	
			for the	n 23(9)	SEBI	Disclosur		23(3) for	Company	
			Half year	on	(LODR)	e for the		the half		
			ended			Half year		year ended		
			31 st March,			ended 31st		31st	1	
			2023			March,		March,		
						2023		2023 by	T	
								paying the		
								fine		
								levied or		
								the		
								Company		
								amounting		
								to Rs.		



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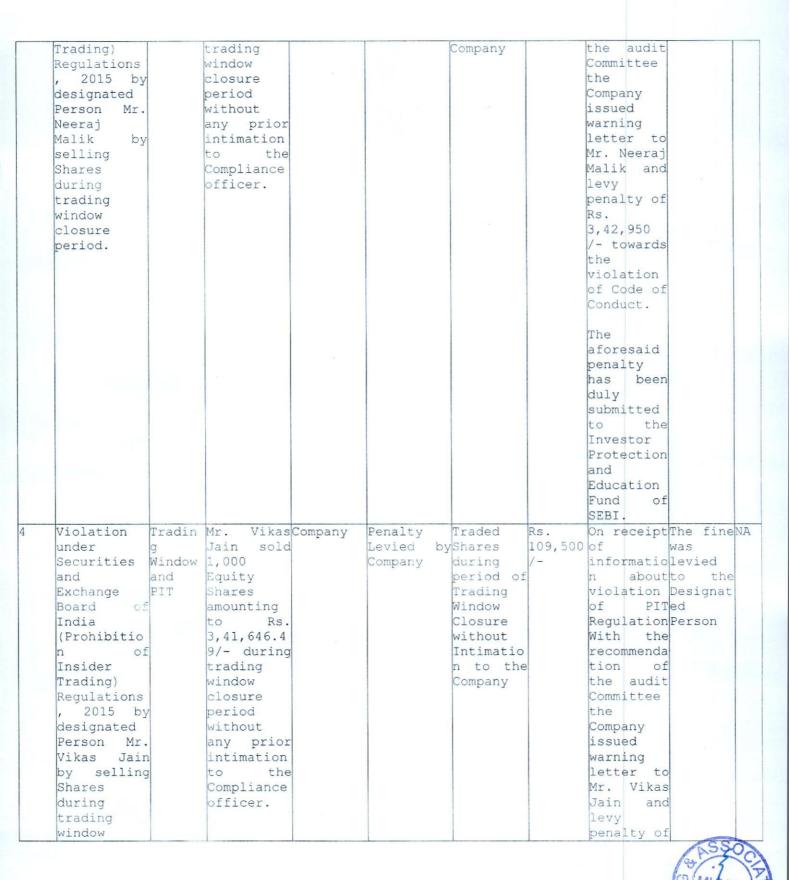
								64,900/-
2	under Securities and	Window and PIT	Mr. KallolMukh erjeebroug ht27 Equity Shares during trading window closure period without any prior intimation to the Compliance officer.		Penalty Levied Company	byShares 9	9740/-	On receipt The fine NA of was informatiolevied n aboutto the violation Designat of PITed RegulationPerson With the recommenda tion of the audit Committee the Company issued warning letter to Mr. Kallol Mukherjee and levy penalty of Rs. 9740 /- towards the violation of Code of Conduct. The aforesaid penalty has been duly submitted to the Investor Protection and Education Fund of SEBI.
3	Violation under Securities and Exchange Board of India (Prohibitio n of Insider		Mr. NeerajMali k sold 10,000 Equity Shares amounting to Rs. 24,91,700 during	1	Penalty Levied Company	byShares 3	Rs. 3,42,95 0 /-	On receiptThe fineNA

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closure		Rs. 1,09,500/-
period.		
		towards
		the
	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	violation
		of Code of
		Conduct.
		The
		aforesaid
		penalty
		has been
		duly
		submitted
		to the
		Investor
		Protection
		and
		Education
		Fund of
		SEBI.

Sr. No.	Compliance Requirement (Regulation s/circulars / guidelines including Specific clause)	tion/C ircula r No.		Taken by	Type of Action	Details of Violatio n		of the Practicing Company Secretary	ent Respons	Remar ks
1.	Violation of UPSI for the year 2020-2021.	g window	Closure of Trading				Rs. Crore	that Aptech by not closing the trading	was filed against the order edated 28.04.20 21 passed fby the dAdjudica sting Officer, fSEBI mpertaini	securi ties Appell ate Tribun al, Mumbai (SAT) agains t the porder

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		powered		for Code of		
		by		Conduct to	violatio	
		Aptech"		monitor and	n of	2021
		for		report	Regulati	passed
		operating			on 9 of	
		pre-		by insiders		
		-				
		schools				cating
		 cannot be			Exchange	
		considere		in Schedule		
		d		B r/w	India	SEBI
		material		Regulation	(Prohibi	pertai
		under the		9 (1) of	tion of	ning
		Regulatio		SEBI (Prohib	Insider	to
		ns 30 r/w			Trading)	
		Schedule		of Insider		
					1501	violat
		the LODR				ion of
		Regulatio		2015		Regula
		ns, is				tion 9
		therefore			1 B 1	of
		not a				Securi
		material				ties
		contract.				and
		Further,				Exchan
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		submitted				Board
		by the				of
		Company				India
		that the				(Prohi
		obligatio			1.1.1	bition
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		close the				Inside
		trading				r
		window				Tradin
		arises				g)
		only when				Regula
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			course of					2023
			business					on
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			material.					e).
1	Tradin		Company	Penalt		Rs.	On receiptThe	fineNA
	2	Mohan		-		21,828	of was	_
Securities	Window	Malla(Vice		Levied	during	/-	information levi	ed
		President		by	period		about to	the
Exchange	PIT	National		Compan	of		violation Desi	gnat
Board of		Sales		V	Trading		of PITed	
India		Head) sold		1	Window		Regulation Pers	on
(Prohibitio		600 Equity			Closure		With the	2
n of		Shares			without		recommendat	122
Insider		amounting			Intimati		ion of the	
Trading)		to Rs.		I I I I I I I I I I I I I I I I I I I	on to		audit	
Regulations		1,66,068			the co		Committee	
, 2015 by		during			Company		the Company	
designated		trading			Company		issued	
Person Mr.		window					warning	
Murli Mohan							-	
		closure					letter to	
Malla by		period					Mr. Murli	
selling		without					Mohan Malla	
Shares		any prior					and levy	
during		intimation					penalty of	
trading		to the	6				Rs. 21,828	
window		Compliance					/- towards	
closure		officer.					the	
period.							violation	
							of Code of	
							Conduct.	
								22
1							The	
							aforesaid	
							penalty has	
							been duly	
							submitted	
							to the	
							Investor	
							Protection	
							and	
						1	Education	
							Fund of	
			87				SEBI.	
 Violation	Tradin	Mr. Saikat	Company	Penalt	Traded	Rs.	On receipt The	fineNA
under		Banerjee	Company	V	Shares	2,400/-	of was	TTHEIMA
	g Window			Leviad	during	2,400/	information levi	ed
	and	old 250			period		about to	the
and a market	Divicio Carlo			by			Concerns and the second s	Decon received a
	PIT	Equity		Compan				gnat
Board of		Shares		У	Trading		of PITed	
India		amounting			Window	1	Regulation Pers	son
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n of		62,500			without		recommendat	
Insider	1	during			Intimati		ion of the	
		trading			on to		audit	
Trading)		1.77						
Regulations		window			the	1	Committee	
, 2015 by	-	closure			Company		the Company	
designated		period					issued	
Person Mr.		without					warning	10
Saikat	1	any prior				2	letter and	
Banerjeeh		intimation					levy	
by selling		to					penalty of	
Shares		Compliance					Rs. 2,400/-	
during		office.					towards the	
trading							violation	
window							of Code of	
closure							Conduct.	
							conduct.	
period.								
							The	
							aforesaid	
							penalty has	
							been duly	
							submitted	
							The second second second second	
							to the	
							Investor	
							Protection	
							and	
							Education	
			1				Equidation	
							Fund of	
							Fund of SEBI.	
Violation		Mr. Sarwan	Company	Penalt		Rs.	Fund of SEBI. On receipt	The fineNA
Violation under		Mr. Sarwan Singh	Company	Penalt Y			Fund of SEBI. On receipt	
		Singh		Penalt Y Levied	Shares	Rs.	Fund of SEBI. On receipt	The fineNA was
under Securities	g Window	Singh (Vice		y Levied	Shares during	Rs.	Fund of SEBI. On receipt of information	The fineNA was
under Securities and	g Window and	Singh (Vice President,		y Levied by	Shares during period	Rs.	Fund of SEBI. On receipt of information about	The fineNA was levied to the
under Securities and Exchange	g Window and PIT	Singh (Vice President, LF Centers		y Levied by Compan	Shares during period of	Rs.	Fund of SEBI. On receipt of information about violation	The fineNA was levied to the Designat
under Securities and Exchange Board of	g Window and PIT	Singh (Vice President, LF Centers &		y Levied by	Shares during period of Trading	Rs.	Fund of SEBI. On receipt of information about violation of PIT	The fineNA was levied to the Designat ed
under Securities and Exchange Board of India	g Window and PIT	Singh (Vice President, LF Centers & Audits)sol		y Levied by Compan	Shares during period of Trading Window	Rs.	Fund of SEBI. On receipt of information about violation of PIT Regulation	The fineNA was levied to the Designat ed Person
under Securities and Exchange Board of India (Prohibitio	g Window and PIT	Singh (Vice President, LF Centers & Audits)sol d 399		y Levied by Compan	Shares during period of Trading Window Closure	Rs.	Fund of SEBI. On receipt of information about violation of PIT Regulation With the	The fineNA was levied to the Designat ed Person
under Securities and Exchange Board of India	g Window and PIT	Singh (Vice President, LF Centers & Audits)sol		y Levied by Compan	Shares during period of Trading Window Closure without	Rs.	Fund of SEBI. On receipt of information about violation of PIT Regulation With the recommendat	The fineNA was levied to the Designat ed Person
under Securities and Exchange Board of India (Prohibitio	g Window and PIT	Singh (Vice President, LF Centers & Audits)sol d 399		y Levied by Compan	Shares during period of Trading Window Closure	Rs.	Fund of SEBI. On receipt of information about violation of PIT Regulation With the	The fineNA was levied to the Designat ed Person
under Securities and Exchange Board of India (Prohibitio n of	g Window and PIT	Singh (Vice President, LF Centers & Audits)sol d 399 Equity		y Levied by Compan	Shares during period of Trading Window Closure without	Rs. 14,833/-	Fund of SEBI. On receipt of information about violation of PIT Regulation With the recommendat	The fineNA was levied to the Designat ed Person
under Securities and Exchange Board of India (Prohibitio n of Insider Trading)	g Window and PIT	Singh (Vice President, LF Centers & Audits)sol d 399 Equity Shares amounting		y Levied by Compan	Shares during period of Trading Window Closure without Intimati on to	Rs. 14,833/-	Fund of SEBI. On receipt of information about violation of PIT Regulation With the recommendat ion of the audit	The fineNA was levied to the Designat ed Person
under Securities and Exchange Board of India (Prohibitio n of Insider Trading) Regulations	g Window and PIT	Singh (Vice President, LF Centers & Audits)sol d 399 Equity Shares amounting to Rs.		y Levied by Compan	Shares during period of Trading Window Closure without Intimati on to the	Rs. 14,833/-	Fund of SEBI. On receipt of information about violation of PIT Regulation With the recommendat ion of the audit Committee	The fineNA was levied to the Designat ed Person
under Securities and Exchange Board of India (Prohibitio n of Insider Trading) Regulations , 2015 by	g Window and PIT	Singh (Vice President, LF Centers & Audits)sol d 399 Equity Shares amounting to Rs. 1,10,753		y Levied by Compan	Shares during period of Trading Window Closure without Intimati on to	Rs. 14,833/-	Fund of SEBI. On receipt of information about violation of PIT Regulation With the recommendat ion of the audit Committee the Company	The fineNA was levied to the Designat ed Person
under Securities and Exchange Board of India (Prohibitio n of Insider Trading) Regulations , 2015 by designated	g Window and PIT	Singh (Vice President, LF Centers & Audits)sol d 399 Equity Shares amounting to Rs. 1,10,753 during		y Levied by Compan	Shares during period of Trading Window Closure without Intimati on to the	Rs. 14,833/-	Fund of SEBI. On receipt of information about violation of PIT Regulation With the recommendat ion of the audit Committee the Company issued	The fineNA was levied to the Designat ed Person
under Securities and Exchange Board of India (Prohibitio n of Insider Trading) Regulations , 2015 by designated Person Mr.	g Window and PIT	Singh (Vice President, LF Centers & Audits)sol d 399 Equity Shares amounting to Rs. 1,10,753 during trading		y Levied by Compan	Shares during period of Trading Window Closure without Intimati on to the	Rs. 14,833/-	Fund of SEBI. On receipt of information about violation of PIT Regulation With the recommendat ion of the audit Committee the Company issued warning	The fineNA was levied to the Designat ed Person
under Securities and Exchange Board of India (Prohibitio n of Insider Trading) Regulations , 2015 by designated Person Mr Sarwan	g Window and PIT	Singh (Vice President, LF Centers & Audits)sol d 399 Equity Shares amounting to Rs. 1,10,753 during trading window		y Levied by Compan	Shares during period of Trading Window Closure without Intimati on to the	Rs. 14,833/-	Fund of SEBI. On receipt of information about violation of PIT Regulation With the recommendat ion of the audit Committee the Company issued warning letter and	The fineNA was levied to the Designat ed Person
under Securities and Exchange Board of India (Prohibitio n of Insider Trading) Regulations , 2015 by designated Person Mr.	g Window and PIT	Singh (Vice President, LF Centers & Audits)sol d 399 Equity Shares amounting to Rs. 1,10,753 during trading		y Levied by Compan	Shares during period of Trading Window Closure without Intimati on to the	Rs. 14,833/-	Fund of SEBI. On receipt of information about violation of PIT Regulation With the recommendat ion of the audit Committee the Company issued warning	The fineNA was levied to the Designat ed Person
under Securities and Exchange Board of India (Prohibitio n of Insider Trading) Regulations , 2015 by designated Person Mr. Sarwan Singh	g Window and PIT	Singh (Vice President, LF Centers & Audits)sol d 399 Equity Shares amounting to Rs. 1,10,753 during trading window		y Levied by Compan	Shares during period of Trading Window Closure without Intimati on to the	Rs. 14,833/-	Fund of SEBI. On receipt of information about violation of PIT Regulation With the recommendat ion of the audit Committee the Company issued warning letter and levy	The fineNA was levied to the Designat ed Person
under Securities and Exchange Board of India (Prohibitio n of Insider Trading) Regulations , 2015 by designated Person Mr. Sarwan Singh selling	g Window and PIT	Singh (Vice President, LF Centers & Audits)sol d 399 Equity Shares amounting to Rs. 1,10,753 during trading window closure period		y Levied by Compan	Shares during period of Trading Window Closure without Intimati on to the	Rs. 14,833/-	Fund of SEBI. On receipt of information about violation of PIT Regulation With the recommendat ion of the audit Committee the Company issued warning letter and levy penalty of	The fineNA was levied to the Designat ed Person
under Securities and Exchange Board of India (Prohibitio n of Insider Trading) Regulations , 2015 by designated Person Mr. Sarwan Singh selling Shares	g Window and PIT	Singh (Vice President, LF Centers & Audits)sol d 399 Equity Shares amounting to Rs. 1,10,753 during trading window closure period without	. ц.	y Levied by Compan	Shares during period of Trading Window Closure without Intimati on to the	Rs. 14,833/-	Fund of SEBI. On receipt of information about violation of PIT Regulation With the recommendat ion of the audit Committee the Company issued warning letter and levy penalty of Rs.	The fineNA was levied to the Designat ed Person
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SG & ASSOCIATES Company Secretaries

Office Address : 203, Second Floor, Mehek Plaza, Above Mehsana Co-op Bank Limited, Maharashtra Nagar, Borivali (W) Mumbai - 92. E-mail : suhas62@yahoo.com
 E-mail : sg.sgfirm@gmail.com
 +91 98200 57999

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								The
							-	aforesaid
								penalty has
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7	Violation	Tradin	Mr. Shajan	Company	Penalt	Traded	Rs.	On receipt The fine NA
ı	under	q	Samuel		v	Shares	20,800/-	
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			President,			period		about to the
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-	n of		Shares			without		recommendat
-	Insider		amounting			Intimati		ion of the
	[rading)		to Rs.			on to		audit
F	Regulations		1,41,000			the		Committee
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C	designated		trading					issued
F	Person Mr.		window					warning
0	Shajan		closure					letter and
	Samuel by		period					levy
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	during		intimation					20,800/-
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				-				SEBI
	Violation		Ms. Pooja	Company	Penalt		Rs.	On receiptThe fineNA
ı	under	g	Mukandan	Company	У	Shares	Rs. 1980/-	On receiptThe fineNA of was
1	under		Mukandan	Company	У			On receiptThe fineNA



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\$ +91 98200 57999



Exchange PIT	Marketing	Compan		violation Designat
Board of	Head) sold	У	Trading	of PITed
India	45 Equity		Window	Regulation Person
(Prohibitio	Shares		Closure	With the
n of	amounting		without	recommendat
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, 2015 by	trading		Company	the Company
designated	window			issued
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				aforesaid
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				been duly
				submitted
				to the
				Investor
				Protection
				and
				Education
				Fund of
				SEBI.

(b) The listed entity has taken the following actions in financial year 2021-22 to comply with the observations made in previous reports:

Place: Mumbai Date: 26.05.2023 SG & ASSOCIATES COMPANY SECRETARIES SUMASSIGANPULE PROPRIETOR C.P. NO. 5722 For SG and Associates Practicing Company Secretary

SG & ASSOCIATES Company Secretaries

Suhas 8 Ganpule Proprietor Membership No.12122 CP No. 5722 UDIN: A012122E000387057

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