13th June, 2020

The National Stock Exchange of India Limited
Exchange Plaza”, 5th Floor,
Plot No. C/1, G Block,
Bandra-Kurla Complex, Bandra (East),
MUMBAI – 400 051
NSE Symbol: APOLLOPIPE

Department of Corporate Services/Listing
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
MUMBAI – 400 001
SCRIP Code: 531761

Dear Sir/Madam,


Kindly take the same on your record and oblige.

Thanking you.

Yours faithfully,

For Apoll Pipes Limited

(Ankit Sharma)
Company Secretary

Encl.: A/a

APOLLO PIPES LIMITED
Regd. Office: 37, Hargobind Enclave, Vikas Marg, Delhi-110092, India
Corporate Office: A-140, Sector-136, Noida-201301 (U.P.), India
Manufacturing Unit: Dadri (U.P.), Ahmedabad (Gujarat), Bengalore (Karnataka), India
Tel: 0120-2973411 | Toll Free No.: 1800-121-3737 | Email: info@apollopipes.com
Website: www.apollopipes.com | CIN: L65999DL1985PLC022723
Dear Sir(s),

Secretarial Compliance Report for the financial year ended March 31, 2020

I have been engaged by APOLLO PIPES LIMITED (FORMERLY “AMULYA LEASING AND FINANCE LIMITED”) whose equity shares are listed on BSE Limited [Security Code: 531761] and National Stock Exchange of India Limited [NSE Symbol: APOLLOPIPE] to conduct an audit and issue Secretarial Compliance Report in terms of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019.

It is the responsibility of the management of the Company to maintain records, devise proper systems to ensure compliance with the provisions of all applicable SEBI Regulations and circulars/guidelines issued there under from time to time and to ensure that the systems are adequate and are operating effectively.

My responsibility is to verify compliances by the company with the provisions of all applicable SEBI Regulations and circulars/guidelines issued there under from time to time and issue a report thereon.

The Audit was conducted in accordance with the Guidance Note on Secretarial Compliance Report issued by ICSI. Secretarial Compliance Report is enclosed herewith.

For Anjali Yadav & Associates
Company Secretaries

Anjali Yadav
Proprietor
FCS No. 6628
CP No. 7257
P/R: 629/2019
UDIN: F006628B000337761
Secretarial Compliance Report of APOLLO PIPES LIMITED (FORMERLY “AMULYA LEASING AND FINANCE LIMITED”) for the financial year ended March 31, 2020

I have examined:

(a) all the documents and records made available to us and explanation provided by APOLLO PIPES LIMITED (FORMERLY “AMULYA LEASING AND FINANCE 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 March 31, 2020 (“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; (as amended from time to time)

(b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; (as amended from time to time)

(c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; (as amended from time to time)

(d) Securities and Exchange Board of India (Buyback of Securities) Regulations, [Not applicable during the period under the Review];
(e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014

(f) Securities and Exchange Board of India (Issue andListing of Debt Securities) Regulations, 2008 [Not applicable during the period under the Review];

(g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; [Not applicable during the period under the Review];

(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

(i) .................. (other regulations as applicable) and circulars/guidelines issued thereunder;

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 examination of those records.

(c) The following are the details of actions taken against the listed entity/its promoters/directors/material subsidiaries 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:

<table>
<thead>
<tr>
<th>Sr. No.</th>
<th>Action taken by</th>
<th>Details of violation</th>
<th>Details of action taken E.g. fines, warning letter, debarment, etc.</th>
<th>Observations/remarks of the Practicing Company Secretary, if any</th>
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</table>

-----------------------------NIL---------------------------------
The advers impact of the global pandemic COVID-19 had resulted into complete nation-wide lockdown. Therefore, my basis of examination for issuing Secretarial Compliance Report for the financial year 2019-20 was restricted to the information/documents provided by the Company in the electronic mode.