

# BAID & BENGANI ASSOCIATES LLP,

COMPANY SECRETARIES

FIRM REGISTRATION NO. L2021WB010400



Century Plaza, 81, N.S.Road, 2nd Floor, R.N.217, Kolkata-700001, West Bengal, India.

E-mail: baidbenganillp@yahoo.com; Ph- +91- 9831115563, 9748819844

**Secretarial Compliance Report of  
M/s. APEX ENTERPRISES (INDIA) LTD  
(for the year ended 31st March, 2024)**

[Pursuant to SEBI Circular No. CIR/CFD/CMD1/27/2019 dt. 8th February, 2019]

We, BAID & BENGANI ASSOCIATES LLP, Company Secretaries, have examined:

- a) all the documents and records made available to us and explanation provided by M/s. APEX ENTERPRISES (INDIA) LTD ("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 March, 2024 ("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;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 (Not applicable to the company during the audit 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 (Not applicable to the company during the audit period);
- (e) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (f) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

and circulars/ guidelines issued thereunder; and based on the above examination, we 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, except in respect of some of the matters specified below:



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Sr.No	Compliance Requirement (Regulation/Circulars/Guidelines including specific clause	Deviation	Observation/ 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 our examination of those records;

(c) The following are the details of actions taken against the listed entity/ its promoters/ directors (the company does not have any material subsidiary) either by SEBI or by Stock Exchanges (including under the standard operating procedures issued by SEBI through various circulars) under the aforesaid Acts/ Regulation and circulars/ guidelines issued thereunder:

Sr.No	Actions taken by	Details of violation	Details of action taken, e.g., fines, warning letter, debarment, etc	Observations/Remarks of Practicing Company Secretary, if any
None				

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

Sr.No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended	Actions taken by listed entity, if any	Comments of Practicing Company Secretary on the action taken by the listed entity
Not Applicable				

BAID & BENGANI ASSOCIATES LLP

Rishabh Baid

Designated Partner

Signature

UDIN - F013071F000529213

Rishabh Baid

(Designated Partner)

Place: Kolkata

Member No.: F13071

CP No.: 12375

Date: 04/06/2024

