



**APEX ENTERPRISES (INDIA) LIMITED**  
**16, NETAJI SUBHAS ROAD, 4<sup>TH</sup> FLOOR**  
**KOLKATA-70001**

**ANNUAL SECRETARIAL COMPLIANCE REPORT**  
**FOR THE YEAR ENDED**  
**31<sup>ST</sup> MARCH 2023**

**TAPAN KUMAR BANERJEE**  
**COMPANY SECRETARY**  
**139, FLAT 3C**  
**LAKE ROAD**  
**KOLKATA 700029**



**Annual Secretarial Compliance Report read with Regulations 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 of M/s. Apex Enterprises (India) Limited for the Year Ended 31<sup>st</sup> March 2023**

**I, Tapan Kumar Banerjee have examined:**

- (a) All the documents and records made available to me, and explanations provided to me by **M/s Apex Enterprises (India) Limited** ("the listed entity")
- (b) The filings submissions made by the listed entity to the stock exchanges
- (c) Websites of the listed entity
- (d) Any other document/ filing as may be relevant, which have been relied upon to make this certification

**For the year ended 31<sup>st</sup> 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, circular, 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")
- (c) The Depositories Act, 1996 and the Regulations and Byelaws framed there under

The Specific Regulations, whose provisions, and the circulars/guidelines issues there under, have been examined include:

- (a) Securities and Exchange Board of India (Listings Obligations and Disclosure Requirements) Regulations, 2015
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares & Takeovers) Regulations, 2011

- (d) \*Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018
- (e) \*Securities and Exchange Board of India (Share based Employee benefits) Regulations, 2014
- (f) \*Securities and Exchange Board of India (Issues and Listings of Debt Securities) Regulations, 2008
- (g) \*Securities and Exchange Board of India (Issues and Listings of Non-Convertible and Redeemable Preference Shares) Regulations, 2013
- (h) \*Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015

\*No events took place under these regulations during the review period and circulars/guidelines issues there under and based on the above examination, I hereby reporting that during the review period:

- (a) The listed entity has complied with the provisions of the above Regulations and circulars/guidelines issues there under, except with respect of matters specified below: Nil

| 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 there under in so far as it appears from my examination of those records
- (c) The following are the details of the actions taken against the listed entity/its promoters/directors/material subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issues by SEBI through



various circulars) under the aforesaid Acts/Regulations and circulars/guidelines issues there under: NIL

| Sr. No | Actions taken by | Details of violation | Details of action taken e.g., fines, warnings letters, 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: NA

| Sr. No | Observations of the Practicing Company Secretary in the previous reports | Observations made in the Secretarial Compliance Report for the year ended 31 <sup>st</sup> March 2023 | Actions taken by the listed entity if any | Comments of the Practicing Company Secretary on the actions taken by the listed entity |
|--------|--------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------|-------------------------------------------|----------------------------------------------------------------------------------------|
|        |                                                                          |                                                                                                       |                                           |                                                                                        |
|        |                                                                          |                                                                                                       |                                           |                                                                                        |

Place: Kolkata

Signature

TAPAN  
KUMAR  
BANERJEE



Tapan Kumar Banerjee  
Company Secretary in Practice  
C.P. No – 17163  
Membership No – 1242  
UDIN: A001242E000371095