

REECHA GOEL & ASSOCIATES
Company Secretaries
Opposite Sachdeva Autos, Civil Lines
Phillaur-144410
Mobile: 09814809461

Secretarial Compliance Report of Anmol India Limited for the year ended 31st March, 2023

To,

The Board of Directors,
Anmol India Limited,
Ludhiana.

We, Reecha Goel & Associates, Practicing Company Secretaries have examined:

- (a) all the documents and records made available to us and explanation provided by Anmol 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 31st March, 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) 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;
- (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 as there was no reportable event during the financial year under review)
- (e) Securities and Exchange Board of India (Share Based Employee Benefits And Sweat Equity) Regulations, 2021 (Not Applicable as there was no reportable event during the financial year under review)
- (f) Securities and Exchange Board of India (Issue and Listing of Non- convertible Securities) Regulations, 2021; ;(Not Applicable as there was no reportable event during the financial year under review)
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (h) Securities and Exchange Board of India (Delisting of Equity Shares) (Amendment)Regulations, 2016; ;(Not Applicable as there was no reportable event during the financial year under review)
- (i) Securities and Exchange Board of India (Investor Protection and Education Fund) Regulations, 2009;
- (j) Securities and Exchange Board of India (Depository Participant) Regulations, 2018;

And based on the above examination, we hereby report that, during the Review Period compliance status of the listed entity is appended below;

Sr. No.	Particulars	Compliance status (Yes/ No/NA)	Observation Remarks by PCS
1.	<p>Secretarial Standards: The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI)</p>	YES	-
2.	<p>Adoption and timely updation of the Policies: All applicable policies under SEBI Regulations are adopted with the approval of Board of Directors of the listed entity.</p> <p>All the policies are in conformity with SEBI Regulations and has been reviewed & timely updated as per the regulations/circulars/ guidelines issued by SEBI</p>	<p>YES</p> <p>YES</p>	<p>-</p> <p>-</p>
3.	<p>Maintenance and disclosures on Website: The listed entity is maintaining a functional website.</p> <p>Timely dissemination of the documents/information under a</p>	<p>YES</p> <p>YES</p>	<p>-</p> <p>-</p>

	<p>separate section on the website.</p> <p>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</p>	YES	-
4.	<p>Disqualification of Director: None of the Directors of the Company are disqualified under Section 164 of the Companies Act, 2013</p>	YES	-
5.	<p>To examine details related to Subsidiaries of listed entities: Identification of material subsidiary companies Requirements with respect to disclosure of material as well as other subsidiaries.</p>	NA	The company does not have any subsidiary.
6.	<p>Preservation of Documents: 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	-
7.	<p>Performance Evaluation: 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</p>	YES	-

8.	<p>Related Party Transactions:</p> <p>(a) The listed entity has obtained prior approval of Audit Committee for all related party transactions.</p> <p>(b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit committee</p>	<p>YES</p> <p>NA</p>	<p>-</p> <p>Not Any</p>
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>	<p>YES</p>	<p>-</p>
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>	<p>YES</p>	<p>-</p>
11.	<p>Actions taken by SEBI or Stock Exchange(s). if any:</p> <p>No Actions taken against the listed entity/its promoters/Directors/subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by</p>	<p>NO</p>	<p>For one instance of non-compliance during the quarter ended March 2022, of Regulation 17(2A) of SEBI (LODR) Regulations, 2015 for which Fine</p>

	SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder		amounting to Rs. 11800/- as levied by both the exchanges in May 2022 which has been paid by the company.
12.	Additional Non-compliances, if any: No any additional non compliance observed for all SEBI regulation/circular/guidance note etc.	NA	Not Any

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

Sr .No	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation/ Circular no.	Deviations	Actions Taken by	Type of Action	Details of Violation	Fine (Rs.)	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
1.	SEBI (LODR) Regulations, 2015- Regulation 17(2A) of	Regulation 17(2A) Non-compliance with the requirements pertaining to quorum of Board meetings.	No independent director was present in board meeting dated 06.01.2022	BSE & NSE	Fine	Atleast one independent director should be present in quorum for top 2000 listed companies w. e. f. 01.04.2020	11800	Fine has been paid by the company.	Company secretary has been directed to ensure strict compliance in future	--

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

Sr.No	Compliance Requirement (Regulations / circulars/ guidelines including specific clause)	Regulation /Circular no.	Deviations	Actions Taken by	Type of Action	Details of Violation	Fine Amount (Rs.)	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
N.A.										

I further report that:-

In terms of SEBI Circular No. CIR/CFD/CMDI/114/2019 dated October 18, 2019 SEBI had inter alia required the listed entity to amend the terms of appointment of its statutory auditors in terms of clauses 6(A) and 6(B) of the said circular. In this regard I report that there was no event of appointment/reappointment/resignation of statutory auditor of the listed entity during the review period and the terms of appointment of its existing statutory auditor include the conditions mentioned in clauses 6(A) and 6(B) of the said circular.

For Reecha Goel & Associates
Company Secretaries

(Reecha Gupta)

Prop.

FCS 6562

C P No.: 7012

Place: Phillaur

Date: 25.05.2023

UDIN: **F006562E000379220**