



AMRAPALI INDUSTRIES LTD.

Date: June 30, 2021

To,
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai – 400 001.

Sub: Annual Secretarial Compliance Report for the financial year ended on March 31, 2021

Ref: Amrapali Industries Limited (Security Id/Code: AMRAPLIN/526241)

Dear Sir,

Pursuant to Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1 /27/2019 dated February 08, 2019, please find attached herewith the "Annual Secretarial Compliance Report" dated June 30, 2021, issued by CS Payal Dhamecha, Proprietor of M/s Payal Dhamecha, & Associates, Practicing Company Secretaries, Ahmedabad for the financial year ended March 31, 2021.

For, Amrapali Industries Limited

Yashwant Thakkar

Yashwant Thakkar
Managing Director
DIN: 00071126
Encl:- A/a



SECRETARIAL COMPLIANCE REPORT OF AMRAPALI INDUSTRIES LIMITED

for the Financial Year ended on March 31, 2021

[Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

We, have examined:

- (a) all the documents and records made available to us and explanation provided by AMRAPALI INDUSTRIES LIMITED (“the Company” or “the listed entity” or “AIL”),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity and
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended on March 31, 2021 (“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;

- i. Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- ii. Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- iii. Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- iv. Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- v. Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 (to the extent applicable);
- vi. The Forward Contracts (Regulation) Act, 1952 and rules made there under;
- vii. Being a clearing member of various commodity exchange, Company has generally complied with compliance of multi Commodity exchange (MCX);
- viii. and circulars/ guidelines/Amendments issued thereunder,

and based on the above examination and explanation/clarification given by the Company and its officers/KMP’s,

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 to the extent applicable and in the manner prescribed, except in respect of matters specified below;

Sr. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	<p>Failure to report demat accounts to the Exchange within the time specified for reporting of such Accounts.</p> <p>SEBI issued Circular Nos. SEBI/HO/MIRSD/MIRSD2/CIR/P/2016/95 dated September 26, 2016, SEBI/HO/MIRSD/MIRSD2/CIR/P/2016/138 dated December 20, 2016, CIR/HO/MIRSD/MIRSD2/CIR/P/2017/64 dated June 22, 2017 and Exchange Circular Nos. MCX/INSP/294/2016 dated September 26, 2016, MCX/INSP/354/2016 dated October 17, 2016, MCX/INSP/420/2016 dated December 06, 2016, MCX/INSP/438/2016 dated December 20, 2016, MCX/INSP/111/2017 dated April 11, 2017, MCX/INSP/195/2017 dated June 22, 2017 & MCX/INSP/400/2017 dated October 30, 2017</p>	<p>The Company has not reported new demat account(s) opened by the stock broker to exchanges within the time specified for reporting of such accounts</p>	<p>The Company was required to report about the opening of new demat account(s) as and when it is opened. MCX vide its letter no. MCX/INSP/CNU/19-20/1287 dated February 17, 2020 has levied a penalty of Rs. 5,000, which were paid by the company.</p>
2.	<p>SEBI joint inspection with MCX - Inspection of books and records for the period April 1, 2018 to June 30, 2019. Post inspection enforcement Action to Multi Commodity exchange of India Limited ("MCX") as a Lead Exchange w.r.t. said inspection in accordance with the applicable Rules, Bye-laws, Business Rules and Circulars of the Exchanges/SEBI.</p>	<ol style="list-style-type: none"> 1. Mis-utilization of client funds 2. In-correct reporting of Margin collection to the exchange. 3. Not having MCCP Certificate. 	<p>Being clearing member of MCX the company is required to be in adherence with applicable Rules, circulars, bye laws of SEBI and MCX. During the SEBI joint inspection with MCX w.r.t. books and records for April 1, 2018 to June 30, 2019, post inspection enforcement action to MCX in which MCX vide its letter no. MCX/INSP/CNU/2020-21/1054 dated December 28, 2020 levied aggregate penalty of Rs. 12,15,770/- as follows and was paid by the Company.</p> <ol style="list-style-type: none"> 1. Mis-utilization of client funds – Penalty of Rs. 12,04,575/- 2. Incorrect reporting of Margin collection to the Exchange – Penalty of Rs. 9695/- 3. Not having MCCP Certification – Penalty of Rs. 1500/-

*A part from above notices, various other penalties for amount of Rs. 631/- Is Imposed by the exchange for not maintaining the Order to Trade Ratio which is directly deducted from the settlement account opened with MCX.

Apart from above non-compliances, we have been informed that the Company is not required to make any compliances with National Commodity & Derivatives Exchange limited (NCDEX) since the Company has not made any trade al-NCDEX during the financial year 2020-21.

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far 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/~~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:

Sr. No.	Action taken by	Details of violation	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
1.	MCX	Failure to report demat accounts to the Exchange within the time specified for reporting of such Accounts. SEBI issued Circular Nos. SEBI/HO/MIRSD/MIRSD2/CIR/P/2016/95 dated September 26, 2016, SEBI/HO/MIRSD/MIRSD2/CIR/P/2016/138 dated December 20, 2016, CIR/HO/MIRSD/MIRSD2/CIR/P/2017/64 dated June 22, 2017 and Exchange Circular Nos. MCX/INSP/294/2016 dated September 26, 2016, MCX/INSP/354/2016 dated October 17, 2016, MCX/INSP/420/2016 dated December 06, 2016, MCX/INSP/438/2016 dated December 20, 2016, MCX/INSP/111/2017 dated April 11, 2017, MCX/INSP/195/2017 dated June 22, 2017 & MCX/INSP/400/2017 dated October 30, 2017	MCX vide its letter no. MCX/INSP/CNU/19-20/1287 dated February 17, 2020 levied penalty of Rs. 5000/-	The Company was required to report about the opening of new demat account(s) as and when it is opened. MCX vide its letter no. MCX/INSP/CNU/19-20/1287 dated February 17, 2020 has levied a penalty of Rs. 5,000 in total which were paid by the company.
2.	MCX	Inspection of books and records for the period April 1, 2018 to June 30, 2019. Post inspection enforcement Action to Multi Commodity exchange of India Limited ("MCX") as a Lead Exchange w.r.t. said inspection in accordance with the applicable Rules, Bye-laws, Business Rules and Circulars of the Exchanges/SEBI.	4. Mis-utilization of client funds 5. In-correct reporting of Margin collection to the exchange. 6. Not having MCCP Certificate.	Being clearing member of MCX the company is required to be in adherence with applicable Rules, circulars, bye laws of SEBI and MCX. During the SEBI joint inspection with MCX w.r.t. books and records for April 1, 2018 to June 30, 2019, post inspection enforcement action to

Sr. No.	Action taken by	Details of violation	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
				<p>MCX in which MCX vide its letter no. MCX/INSP/CNU/2020-21/1054 dated December 28, 2020 levied aggregate penalty of Rs. 12,15,770/- as follows and was paid by the Company.</p> <ol style="list-style-type: none"> Mis-utilization of client funds – Penalty of Rs. 12,04,575/- Incorrect reporting of Margin collection to the Exchange – Penalty of Rs. 9695/- Not having MCCP Certification – Penalty of Rs. 1500/-

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

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended on March 31, 2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	Submission of quarterly reports containing information on cyber-attacks and threats experienced by Stock Brokers and measures taken to mitigate vulnerabilities, threats and attacks including information on bugs / vulnerabilities / threats (Information sharing on Cyber Security Incident) that may be useful for other Stock Brokers of Stock Exchanges for the quarter ended on June 30, 2019, September 30, 2019	The Company has not submitted Cyber Security Incident Report for the quarter ended on June 30, 2019, September 30, 2019 and March 31, 2020.	The Company took note for a respective period. The window for submission of report for respective quarters are closed by MCX portal.	The Company is advised to devise a system of compliance for making various quarterly/monthly required submission to stock Exchange and for the FY 2020-21 the company adhered with the said requisite submission.

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended on March 31, 2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
	<p>and March 31, 2020.</p> <p>MCX Circulars nos.MCX/TECH/524/2018 dated December 13, 2018 and MCX/TECH/058/2019 dated January 31, 2019 and MCX/TECH/375/2019 dated July 19, 2019, 2019MCX/TECH/587/2019 dated October 16, 2019 and MCX/TECH/ 590/2019 and October 17, 2019 and MCX/TECH/167/2020 dated March 12, 2020 read with SEBI Circular No. SEBI/HO/MIRSD/CIR/PB/2018/18/147 dated December 03, 2018 and SEBI/HO/MIRSD/DOP/CIR/P/2019/109 dated October 15, 2019.</p>			
2.	<p>Report on AI (Artificial Intelligence) and ML (Machine Learning) technologies MCX Circulars nos. MCX/INSP/014/2019 dated January 11, 2019 and MCX/TECH/308/2019 dated June 14, 2019 and MCX/TECH/361/2019 dated July 8, 2019 and MCX/TECH/508/2019 dated September 17, 2019 and MCX/TECH/564/2019 dated October 09, 2019 and MCX/TECH/700/2019 dated December 13, 2019 and MCX/TECH/021 /2020 dated January 09, 2020 read with</p>	<p>The Company has not submitted Report on AI (Artificial Intelligence) and ML (Machine Learning) technologies for the Quarter ended on March 19, 2019, September 30, 2019 and December 31, 2019.</p>	<p>The Company took note for a respective period. The window for submission of report for respective quarters are closed by MCX portal.</p>	<p>The Company is advised to devise a system of compliance for making various quarterly/monthly required submission to stock Exchange and for the FY 2020-21 the company adhered with the said requisite submission.</p>

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended on March 31, 2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
	SEBI Circular No. SEBI/HO/MIRSD/DOS2/CIR/P/2019/10 dated January 04, 2019.			
3.	<p>Failure to report demat accounts opened by the stock broker to exchanges within the time specified for reporting of such accounts.</p> <p>MCX Circular Nos.MCX/INSP/294/2016 dated September 26, 2016 and MCX/INSP/325/2016 dated September 29, 2016 and MCX/INSP/354/2016 dated October 17, 2016 and MCX/INSP/420/2016 dated December 06, 2016 and MCX/INSP/438/2016 dated December 20, 2016 and MCX/INSP/111/2017 dated April 10, 2017 and MCX/INSP/195/2017 dated June 22, 2017and MCX/INSP/400/2017 dated October 30, 2017 read with SEBI Circular No. SEW/HO/MI RSD/MIRSD2/CIR/P/2016/95 dated September 26, 2016 and SEBI/1-10/MIRSD/MIRSD2/CIRCIR/F10/MIRSD/MIRSD21CIR/P/2017/64 dated June 22, 2017</p>	<p>The Company has not reported new demat account(s) opened by the stock broker to exchanges within the time specified for reporting of such accounts</p>	<p>The Company was required to report about the opening of new demat account(s) as and when it is opened. MCX has levied a penalty of Rs. 5,000 in total which were paid by the company through its Settlement Account opened with MCX.</p>	<p>The Company should device a system to intimate to stock exchange immediately on opening of new demat account, to avoid such penalties.</p>

We further report that, during the review period, following regulations issued by the Securities and Exchange Board of India were not applicable to the Company, since there were no such instances occurred during the review period that requires the compliance under the said regulations;

(a) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;

PAYAL DHAMECHA
Company Secretary

ACS, LLB, B.COM

-
- (b) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
(c) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009
(d) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
(e) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 and
(f) and circulars/ guidelines/Amendments issued thereunder.

Payal Dhamecha



Place: Ahmedabad

Date: June 30, 2021

Signature:

Name of Practicing Company Secretary: Payal Dhamecha

ACS No. : 47303

C P No. : 20411

UDIN: A047303C000552489

S/1, 2nd Floor, Olway House, Nr. Navneet House, Gurukul, Ahmedabad – 380052
M: +91 – 8238328985, Email: cspayald1314@gmail.com

The professional firm where Corporate Governance & Customer Satisfaction Matters.