

**P M AGARWAL & CO.**  
**COMPANY SECRETARIES**

Regd. Off: 503, Atlanta Estate, Near Virwani Estate, Goregaon East, Mumbai-400063.

**SECRETARIAL COMPLIANCE REPORT**  
**OF**

**MAHA RASHTRA APEX CORPORATION LIMITED**

**for the year ended 31<sup>st</sup> March, 2022**

*(pursuant to SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019)*

We, M/s. **P M Agarwal & Co.** Company Secretaries, have examined:

- (a) all the documents and records made available to us and explanation provided by **Maha Rashtra Apex Corporation 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 31<sup>st</sup> March, 2022 ("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
- (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
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; NOT APPLICABLE
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; NOT APPLICABLE
- (g) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013; NOT APPLICABLE

Contact No. 7738665955



Email ID: [pm.agarwal17@gmail.com](mailto:pm.agarwal17@gmail.com)  
[cspriyankagarwal@gmail.com](mailto:cspriyankagarwal@gmail.com)

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

(i) .....(other regulations as applicable) NOT APPLICABLE

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 matters specified below:-

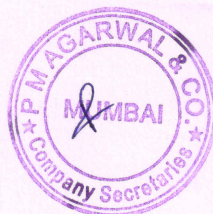
Sr.No	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
01	Regulation 34 of SEBI (LODR), Regulations, 2015	--	The Company had paid the fine of Rs. 2,360/- dated 19 <sup>th</sup> January, 2022 towards fine imposed for Non-Compliance of Regulation 34 of LODR.

(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) During the period under review, 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.
None				

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



There being no observation in the Annual Secretarial Compliance Report for the previous year, reporting on actions to comply with its observations do not arise.

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Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended... <i>(The years are to be mentioned)</i>	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
None				

Place: Mumbai  
Date: 26.05.2022

For P M Agarwal & Co.  
Company Secretaries

*Priyanka*



Priyanka Agarwal  
(Proprietor)  
UDIN: A051154D000396158  
A.C.S. No. 51154 C.P. No. 19363

Peer Review No.:1654/2022