

AMARNATH SECURITIES LIMITED

CIN NO. L67120GJ1994PLC023254

Regd. Office : Sarthak 1/104, Opp. C.T. Centre, Near Swastik Cross Road, C.G. Road,
Navrangpura, Ahmedabad-380009, www.amarnathsecurities.com

To,
Corporate Relationship Dept,
Bombay Stock Exchange Limited,
PJ Towers, Dalal Street,
Fort, Mumbai- 40001.

Thursday August 05, 2021

Dear Sir/Madam,

Subject: Submission of Annual Secretarial Compliance Report for the year ended 31st March 2021

Pursuant to SEBI Circular CIR/CFD/CMD1/27/2019 dated 8th February, 2019, please find enclosed copy of the of Annual Secretarial Compliance Report dated August 05, 2021, issued by Shivam Sharma & Associates, Secretarial Auditors of the Company, for the financial year 2020-2021.

You are requested to note the above on your records.

Thanking You,
Yours Sincerely,

For Amarnath Securities Limited



Naresh Padir
Whole-Time Director
DIN No. 08379067

Corporate office : Unit no 705, Minera Estate A wing 02 Commercial Tower Mulund west- 400080



SECRETARIAL COMPLIANCE REPORT OF AMARNATH SECURITIES LIMITED FOR THE YEAR ENDED 31ST
MARCH, 2021.

To,
Amarnath Securities Limited
Reg. office: 1/ 104, Sarthak, Opp. C. T. Centre
B/H. Swastik Cross Road
C. G. Road, Ahmadabad GJ - 380009.

Corporate office: Office No 705, Minera Estate, A wing,
02 Commercial Tower, Mulund (W), Mumbai 400080.

We Shivam Sharma & Associates have examined:

- (a) all the documents and records made available to us and explanation provided by Amarnath Securities Limited,
- (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, 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:-

- (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 (Share Based Employee Benefits) Regulations, 2014; **(Not applicable to the Company during the audit period)**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not applicable to the Company during the audit period)**
- (g) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013; **(Not applicable to the Company during the audit period)**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

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
1	Regulation 17(1) of SEBI (LODR) Regulation, 2015	-	The Company has been failed to comply with the provisions of Regulation 17(1) for quarter ended December 2019, March 2020 & June 2020.
2	Regulation 6(1) of SEBI (LODR) Regulation, 2015.	-	The Company has been failed to comply with the provisions of Regulation 6(1) for quarter ended March 2020 & June 2020.
3	Mandatory Disclosure on Company's website according to provisions SEBI (LODR) Regulation, 2015.		The Company is in processing to update the website with respect to disclosure according to provisions of SEBI (LODR) Regulation, 2015.

(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 my/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	SEBI	The Company is failed to comply the provisions of Regulation 17(1) for quarter ended December 2019, March	The SEBI levied fine of Rs.16,16,600/-.	The Company has been complied the provisions with the fine levied



ShivamSharma & Associates
Company Secretaries
B.Com, ACS

		2020 & June 2020.		by the SEBI for Rs.16,16,600/-.
2	SEBI	The Company is failed to comply the provisions of Regulation 6(1) for quarter ended March 2020 & June 2020.	The SEBI levied fine of Rs.1,56,940/-	The Company has been complied the provisions with the fine levied by the SEBI for Rs.1,56,940/-.

(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 (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
Not Applicable				

(e) Trading in the securities of the Company has been suspended w.e.f. October 21, 2020, (vide Notice no. 20200929-56 dated September 29, 2020. Pursuant to the provisions of SEBI SOP circular dated May 3, 2018, on account of non-compliance with Regulation 17(1) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 for two consecutive quarters/years i.e., December 2019 and March 2020. Thereafter the Company has been complied the provisions with the fine levied by the SEBI.

Thanking You

For Shivam Sharma & Associates



Shivam Sharma
(Proprietor)
M.No.: A35727, CP. No.: 16558
UDIN: A035727C000739166
Date: 05.08.2021
Place: Mumbai