



# ASIA PACK LIMITED

CIN : L74950RJ1985PLC003275

REGISTERED OFFICE  
3rd Floor, Miraj Campus, Uper Ki Oden, Nathdwara,  
Rajsamand, Rajasthan, India, PIN-313301

1800 120 3699

www.asiapackltd.com

Ref.: APL/SEC/PCS Reg. 24 A/2020-21

Date: 16<sup>th</sup> June, 2021

Corporate Relationship Department,  
**BSE Limited,**  
25th Floor, P J Towers, Dalal Street,  
Mumbai, Maharashtra, India, PIN-400001  
Email: corp.relations@bseindia.com; corp.compliance@bseindia.com  
**Scrip Code: 530899**

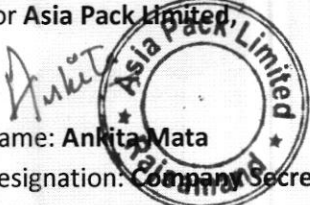
Dear Sir/ Madam,

**Subject:** Annual Secretarial Compliance Report under Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, for the Financial Year ended 31<sup>st</sup> March, 2021

Pursuant to Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed herewith the Annual Secretarial Compliance Report received from Company Secretary in Whole Time Practice, Mr. B. L. Harawat, Proprietor of B. L. Harawat & Associates, Udaipur, for the Financial Year ended 31<sup>st</sup> March, 2021.

You are requested to take the same on records, upload at your website & intimate the same to the members of the Stock Exchange.

Thanking You  
Yours Faithfully,  
For Asia Pack Limited

  
Name: Ankita Mata  
Designation: Company Secretary and Compliance Officer  
Membership No.: A56788  
Address: 60 Jawahar Nagar, Udaipur, Rajasthan, India, PIN-313001  
Mobile No.: 8875992827

Encl.: as above

www.mirajgroup.in

# B. L. Harawat & Associates

**B. L. HARAWAT**  
B.A., LL.B., A.C.S.  
Company Secretary

102, SECTOR-11,  
HIRAN MAGRI  
UDAIPUR (RAJ.)  
PIN 313 002

Ref.

Date

## SECRETARIAL COMPLIANCE REPORT OF ASIA PACK LIMITED FOR THE YEAR ENDED 31<sup>ST</sup> MARCH, 2021

I, B. L. Harawat, proprietor of M/s. B. L. Harawat & Associates, Udaipur, have examined:

- (a) all the documents and records made available to us and explanation provided by Asia Pack 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, 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 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 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 during the review 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 during the review period.**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;- **Not Applicable during the review period.**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; -**Not Applicable during the review period.**



- (g) Securities and Exchange Board of India (Issue and Listing of Non-convertible and Redeemable Preference Shares) Regulations, 2013; **-Not Applicable during the review period.**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Depositories and Participants) Regulations 2018;
- and circulars/guidelines issued thereunder;

and based on the above examinations, ~~I/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:-

Sl. No.	Compliance Requirement (Regulations/Circular/Guidelines including specific clause)	Deviations	Observations/Remarks of the Practicing Company Secretary
-----NIL-----			

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under insofar as it appears from ~~my/our~~ examination of those records.
- (c) There were no action 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 there under;

Sl. No.	Action taken by	Details of Violations	Details of action taken i.e. Fines, Warning letter, debarment, etc.	Observations / Remarks of the Practicing Company Secretary, if any
-----NIL-----				



- (d) There are no observations made in previous reports hence listed entity need not to take any action thereof.

Sl. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended 31.03.2020	Action taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
-----NIL-----				

For B. L. Harawat & Associates

Company Secretaries  
For B. L. HARAWAT & ASSOCIATES



PROPRIETOR  
B. L. Harawat

Proprietor

M. No.: ACS6098

C.P. No.: 3326

Date: 15<sup>th</sup> June, 2021

Place: Udaipur

UDIN:

**A006098C000467801**

