

!! श्री वीतरागाय नमः !!

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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(L74950RJ1985PLC003275) FOR
THE YEAR ENDED 31ST MARCH, 2022**

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

- all the documents and records made available to us and explanation provided by Asia Pack Limited ("the listed entity"),
- the filings/submissions made by the listed entity to the Stock Exchanges,
- website of the listed entity,
- any other document/filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31st March, 2022 ("Review Period") in respect of compliance with the provisions of:

- the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the regulations, circulars, guidelines issued there under; and
- 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:-

- Securities and Exchange Board of India(Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;-**Not Applicable during the review period.**
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; -**Not Applicable during the review period.**
- Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;- **Not Applicable during the review period.**
- 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 in so far 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-----				

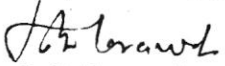


(d) There are no observations made in previous reports hence listed entity need not to take any action thereof.

Sl. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended 31.03.2021	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


B. L. HARAWAT

Proprietor

M. No.: ACS6098

C.P. No.: 3326

Date: 9th May, 2022

Place: Udaipur

UDIN:..A006098D000290338

