

**SECRETARIAL COMPLIANCE REPORT OF
ALPHAGEO (INDIA) LIMITED
FOR THE YEAR ENDED 31.03.2022**

We, D.Hanumanta Raju & Co, Company Secretaries, having our office at B-13, F-1, P.S.Nagar, Vijayanagar Colony, Hyderabad – 500 057 have examined:

- a) all the documents and records made available to us and explanations, information and clarifications provided by **ALPHAGEO (INDIA) LIMITED**, (“The Listed Entity”),
- b) the filings/ submissions made by the Listed Entity to the stock exchanges,
- c) website of the Listed Entity,
- d) declaration received from the listed entity on Annual Compliance for the year ended 31st March, 2022 (“Review Period”) in respect of compliance with the provisions of:
 1. the Securities and Exchange Board of India Act, 1992 (“SEBI Act”) and the Regulations, circulars, guidelines issued there under; and
 2. 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 there under, 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;
- 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 Listed Entity during the period under review)**
- e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021;
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not applicable to the Listed Entity during the period under review)**



- g) Securities and Exchange Board of India (Issue and Listing of Non Convertible and Redeemable Preference Shares) Regulations, 2013 (**Not applicable to the Listed Entity during the period under review**);
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;
- j) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018.

and circulars/ guidelines issued there under; 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 there under, except in the matters specified below

Sr. No.	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Deviations	Observations/Remarks of the Practising Company Secretary
1.	Disclosure of events or information under Regulation 30 of (Listing Obligations and Disclosure Requirements) Regulations, 2015	Intimation of revision in credit rating.	It is observed that Listed Entity has received credit rating report from CRISIL, the credit rating agency on 21.04.2021 and the same was intimated on 28.04.2021.

- (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 our examination of those records.
- (c) No actions were taken against the Listed Entity/ its promoters/ directors 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.



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

Sr. No	Observations of the Practising Company Secretary in the previous reports	Observations made in the Secretarial Compliance report for the year ended:	Actions taken by the listed entity, if any	Comments of the Practising Company Secretaries on the actions taken by the listed entity
1.	The Listed Entity has received credit rating report from CRISIL, the credit rating agency on 12.09.2020 and the same was intimated on 23.09.2020.	31 st March, 2021	The letter from CRISIL was received on the email id of an ex-official of the Company which was not functional. Upon follow up with the CRISIL, the same was communicated to the Company's Authorised official. On receipt of the information, the Company submitted the requisite disclosure to the stock exchanges.	During the review period Listed Entity has intimated about the credit rating as per the observation made in the report.

(e) The reporting on compliance of Clause 6(A) and 6(B) of the circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019 issued by Securities and Exchange Board of India on "Resignation of statutory auditors from listed entities and their material subsidiaries" is not applicable during the Review Period.

**Place: Hyderabad
Date: 27.05.2022**



**For D.HANUMANTA RAJU & CO
COMPANY SECRETARIES**

**CS MOHIT KUMAR GOYAL
PARTNER**

FCS: 9967, CP NO: 12751

UDIN: F009967D000412479

PR NO: 699/2020