

**SECRETARIAL COMPLIANCE REPORT OF
ANIK INDUSTRIES LIMITED FOR THE YEAR ENDED 31.03.2025**

(Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and SEBI Master Circular SEBI/HO/CFD/PoD2/CIR/P/0155 dated 11th November, 2024)

We have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by **M/s Anik Industries Limited (CIN: L24118MH1976PLC136836)** (hereinafter referred as 'the listed entity'), having its Registered Office at 610, Tulsiani Chambers, Nariman Point, Mumbai MH 400021 IN. Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing our opinion thereon.

Based on our verification of the listed entity's books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Review, we hereby report that in our opinion, the listed entity has, during the review period covering the financial year ended on 31st March, 2025, complied with the statutory provisions listed hereunder and also that the listed entity has proper Board processes and compliance mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

We, Ajit Jain & Co., Practicing Company Secretary have examined:

- (a) all the documents and records made available to us and explanation provided by **Anik Industries Limited (CIN: L24118MH1976PLC136836)** ("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 **31st March, 2025** 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; **(Which is not applicable on the company during 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; **(Which is not applicable on the company during review period);**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Which is not applicable on the company during review period);**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Which is not applicable on the company during review period);**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **(Which is not applicable on the company during review period);**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009; **(Which is not applicable on the company during review period)**

and circulars/ guidelines issued thereunder,

and based on the above examination, 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:

S. No	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of violation	Fine Amount	Observations/Remarks of the Practicing Company secretary	Management Response	Remarks
01	SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	Regulation 34	The Company has delayed the submission of Annual	The National Stock Exchange of India (NSE)	Advisory/ Warning	Non-Compliance of Regulation 34 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	-	The Company has delayed the submission of Annual	The Company has commenced the dispatch of Notice of 48 th Annual General Meeting (AGM) and Annual Report to the shareholders on 03 rd	-



			Report by one (1) day with the Exchange for the year ended March 31, 2024			on and Disclosure Requirements), 2015.		Report by one (1) day with the Exchange for the year ended March 31, 2024	September, 2024 but the same is expected/decided to be commenced on 04 th September, 2024, therefore due to absolute inadvertence the intimations to exchanges got delayed by just one day. The Management affirmed that necessary steps will be taken to avoid the same in future.	
02	SEBI (Depositories and Participants) Regulations, 2018	Regulation 74 (5)	The Company has delayed the submission of certificate by one (1) day with the Exchange for the quarter ended December 31, 2024	-	-	Non-Compliance of Regulation 74 (5) of SEBI (Depositories and Participants) Regulations, 2018.	-	The Company has delayed the submission of certificate by one (1) day with the Exchange for the quarter ended December 31, 2024	The delay for submission of certificate under regulation 74 (5) of SEBI (Depositories and Participants) Regulations, 2018 was due to absolute inadvertence and some technical error. The Management affirmed that necessary steps will be taken to avoid the same in future.	-
03	Master circular for compliance with the provisions of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 by listed entities	SEBI/HO/CFD/PoD2/CIR/P/2023/120 dated 11.07.2023 and SEBI/HO/CFD/PoD2/CIR/P/0155 dated 11.11.2024	The Company not disclosed the resignation of Auditor of its material subsidiary "Revera Milk & Foods Pvt. Ltd."	-	-	Non-Compliance Paragraph 9 of section V-D of chapter V of the Master Circular on the provisions of the LODR Regulations	-	The Company not disclosed the resignation of Auditor of its material subsidiary "Revera Milk & Foods Pvt. Ltd."	The non-submission of disclosure Paragraph 9 of section V-D of chapter V of the Master Circular on the provisions of the LODR Regulations, caused due to non-receipt of details/information from the "Revera Milk & Foods Pvt. Ltd." The Management affirmed that necessary steps will be taken to avoid the same in future.	-



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

S. No.	Observations/Remarks 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)	Compliance Requirement (Regulations/circulars /guidelines including specific clause)	Details of violation / deviations and actions taken / penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
01	The Financial Results for the quarter ended March 31, 2023 was not submitted within due time.	Observations made in the secretarial compliance report for the year ended March 31, 2024	Regulation 33 of SEBI (Listing obligations and Disclosure Requirements) Regulation, 2015	The Financial Results for the quarter ended March 31, 2023 was not submitted with Stock Exchanges within time, approved in the Board Meeting held on 06.06.2023, and Fine were imposed by The National Stock Exchange of India (NSE) And BSE Limited (BSE) Rs. 82,600/- (Including GST of Rs. 12,600/-)	The Meeting of Board of Directors of the Company which was originally scheduled at Tuesday, 30th May, 2023 , for the Approval of (Standalone and Consolidated) Financial Results for the quarter and financial year ended 31 st March, 2023 is adjourned for the want of quorum and the adjourned meeting was held on Tuesday, 06th June 2023 (same day in the next week, at the same time and place) . The Company had already paid the fine to both the exchanges. The Management affirmed that necessary steps will be taken to avoid the same in future.	The Company had paid the fine to both the exchanges. The Management affirmed that necessary steps will be taken to avoid the same in future.
02	The annual listing fee for the financial year 2023-24, were not paid to both the Stock Exchanges within time	Observations made in the secretarial compliance report for the year ended March 31, 2024	Regulation 14 of SEBI (Listing obligations and Disclosure Requirements) Regulation, 2015	The annual listing fee for the financial year 2023-24, were not paid to both the Stock Exchanges within time	The listing fee for the year 2023-24 has already been paid to both the Stock Exchanges, but due to some unavoidable events and situations the payment were made as on 29.05.2023 i.e., after due dates. The Management affirmed that necessary steps will be taken to avoid the same in future.	The listing fee for the year 2023-24 has been paid to both the Stock Exchanges, after due date on 29.05.2023. The Management affirmed that necessary steps will be taken to



						avoid the same in future.
03	The Financial Results for the quarter ended September 30, 2022 approved in the Board Meeting held on 14.11.2022 was not submitted with The National Stock Exchange of India within time.	Observations made in the secretarial compliance report for the year ended March 31, 2023	Regulation 33 of SEBI (Listing obligations and Disclosure Requirements) Regulation, 2015	The Financial Results for the quarter ended September 30, 2022 was not submitted within due time after approval in Board Meeting and fine of Rs. 5900/- (Including GST of Rs. 900/-) imposed by The National Stock Exchange of India	The Company has submitted the clarification for the delay and reply of the NSE is still awaited as the submission of Financial Results was got delayed by only one day due to some technical glitch/errors at NSE India website.	The Company has submitted the clarification for the delay.

(c) We hereby report that, during the review period the compliance status of the listed entity with the following requirements:

S. No.	Particulars	Compliance Status (Yes/No/NA)	Observation/Remarks by PCS*
1.	Secretarial Standards: The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI)	Yes	None
2.	Adoption and timely updation of the Policies: <ul style="list-style-type: none"> All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities All the policies are in conformity with SEBI Regulations and have been reviewed & updated on time, as per the regulations/circulars/guidelines issued by SEBI. 	Yes Yes	None None
3.	Maintenance and disclosures on Website <ul style="list-style-type: none"> The Listed entity is maintaining a functional website Timely dissemination of the documents/information under a separate section on the website Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re- directs to the 	Yes Yes Yes	None None None



	relevant document(s)/ section of the website.		
4.	Disqualification of Director: None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	Yes	None
5.	Details related to Subsidiaries of listed entities have been examined w.r.t.: (a) Identification of material subsidiary companies (b) Requirements with respect to disclosure of material as well as other subsidiaries	Yes Yes	None None
6.	Preservation of Documents: The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.	Yes	None
7.	Performance Evaluation: The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.	Yes	None
8.	Related Party Transactions: (a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or (b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.	Yes NA	Prior Approval was taken for all Related Party Transactions.
9.	Disclosure of events or information: The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.	Yes	None
10.	Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5)	Yes	None



	& 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.		
11.	Actions taken by SEBI or Stock Exchange(s), if any: No action(s) has been taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder except as provided under separate paragraph herein (*).	Yes	None
12.	Resignation of statutory auditors from the listed entity or its material subsidiaries In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and / or its material subsidiary(ies) has / have complied with paragraph 6.1 and 6.2 of section V-D of chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities.	Yes	None
13.	Additional Non-compliances, if any: No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	Yes	No additional non-compliance was observed for any SEBI regulation/ circular/guidance note etc. during the year under review.

**Observations/Remarks by PCS are mandatory if the Compliance status is provided as 'No' or 'NA'*

Assumptions & Limitation of scope and Review:

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to certify based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial Records and Books of Accounts of the listed entity.
4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.



Date: 13/05/2025
Place: Indore



For, Ajit Jain & Company
(Practicing Company Secretary)

A. K. Jain

CS Ajit Jain
Proprietor

COP No.: 2876 & FCS No.: 3933

UDIN F003933G000331601

Peer Review Certificate No 6478/2025

PCS Unique ID No.: S1998MP023400