

Sec/Alum/238

Date: 29.05.2019

The Secretary
BSE Limited
New Trading Wing,
Rotunda Building,
PJ Tower, Dalal Street,
Mumbai- 400001
Scrip Code: 539045

The Manager
National Stock Exchange of India Limited
Exchange Plaza, C-1, Block "G"
5th floor, Bandra Kurla Complex, ,
Bandra East
Mumbai- 400051
Scrip Code: MANAKALUCO

Dear Madam/Sir,

Sub: Annual secretarial Compliance Report

Please find enclosed the Annual Secretarial Compliance Report of Manaksia Aluminium Company Limited for the year ended 31st March, 2019, certified by Drolia & Company, Practicing Company Secretaries dated 20th May, 2019.

This Report has been issued in terms of SEBI Circular no. CIR/CFD/CMD1/27/2019 dated February 8, 2019.

This is for your information and record.

Thanking you,

Yours faithfully,

For Manaksia Aluminium Company Limited

Vivek Jain

Vivek Jain

Company Secretary

Encl: As above



DROLIA & COMPANY
(Company Secretaries)

9, Crooked Lane, Kolkata - 700069

Mobile: 09831196869; Email: droliapravin@yahoo.co.in

Secretarial Compliance Report of M/s Manaksia Aluminium Company Limited
for the year ended 31st March, 2019

(Pursuant to SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019)

To
Manaksia Aluminium Company Limited
8/1, Lal Bazar Street,
Bikaner Building, 3rd Floor,
Kolkata- 700001

I, Pravin Kumar Drolia, Proprietor of Drolia & Company, Company Secretaries have examined:

- (a) all the documents and records made available to us and explanation provided by M/s Manaksia Aluminium Company Limited. (hereinafter called as "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 2019 (hereinafter called as "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"); and

The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder and applicable to the above listed entity, 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 (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (c) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (d) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018; and other regulations as applicable and circulars/ guidelines issued thereunder.

The Company has not carried out any activities during the review period under the following Regulations: -

- (a) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
- (b) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (c) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;



- (d) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- (e) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;

and based on the above examination, I hereby report that, during the Review Period:

- (a) The listed entity has complied with all the provisions of the above applicable Regulations and circulars/ guidelines issued thereunder during the period under review. The Company has not received any notice from Stock Exchange and SEBI regarding contravention and non-compliance of applicable Regulations and circulars/ guidelines issued thereunder.
- (b) The listed entity has maintained proper records under the provisions of the above applicable Regulations and circulars/ guidelines issued thereunder insofar as it appears from my examination of those records.
- (c) There were no any 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:
- (d) The listed entity has taken the following actions to comply with the observations made in previous reports: **NOT APPLICABLE**, as this being the first reporting since the notification of the requirements to submit the report, reporting on actions to comply with the observations made in the previous reports do not arise.

FOR DROLIA & COMPANY
(Company Secretaries)
(Pravin Kumar Drolia)
Proprietor
F.C.S No.2366, CP 1362



Place: Kolkata
Date: 20/05/2019