

APEX CAPITAL AND FINANCE LIMITED

(Formerly Apex Home Finance Limited)



To

25th May, 2022

The Listing Department
BSE Limited
Pheeroze Jeejeebhoy Towers,
Dalal Street, Mumbai- 400001.

Scrip Code: 541133; Security ID: ACFL

Subject: Submission of Secretarial Compliance Report of Apex Capital and Finance Limited ("the Company") for the financial year ended on March 31, 2022 in compliance with Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Dear Sir/Ma'am,

Pursuant to the provisions of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed herewith the Annual Secretarial Compliance Report as issued by M/s S. Behera & Co., Company Secretaries (FCS No. 8428), New Delhi, for the financial year ended 31st March, 2022. You are requested to take the same on record.

This is for your information and records.

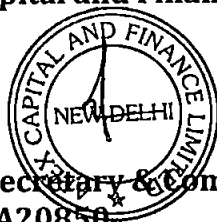
Thanking you.

Yours faithfully,

For Apex Capital and Finance Limited


P. Jha

(Company Secretary & Compliance Officer)
ICSI M. No.: A20850



Encl.: As above

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**SECRETARIAL COMPLIANCE REPORT
OF**

APEX CAPITAL AND FINANCE LIMITED FOR THE YEAR ENDED 31ST MARCH, 2022

*[Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations,
2015 vide SEBI Circular No. CIR/CFD/CMD1/27/2019]*

To,
The Board of Directors,
Apex Capital And Finance Limited
L-3, Green Park Extension,
New Delhi - 110016

We S. Behera & Co., Company Secretaries have examined:

- (a) all the documents and records made available to us and explanation provided by APEX CAPITAL AND FINANCE LIMITED ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges, website of the listed entity,
- (c) all 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 :
 - (i) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
 - (ii) 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:-

- (i) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;



- (ii) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (iii) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (iv) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
- (v) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (vi) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- (vii) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- (viii) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (ix) Other Regulations, and Circulars, Guidelines issued thereunder, as applicable to the Company;

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 thereunder, except in respect of matters specified below:-

Sr. No.	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	Nil	Nil	Nil

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from my/our examination of those records.
- (c) The following are the details of 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 there under:



Sr. No.	Action taken by	Details of Violation	Details of Action taken e.g. fines, warning letter, debarment etc.	Observation/Remarks of the Practicing Company Secretary, if any
1.	Nil	Nil	Nil	Nil

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

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observation made in the Secretarial Compliance Report for the FY ended 31 st March, 2022	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	Nil	Nil	Nil	Nil

Note:

1. List of all the observations in the report for the previous year along with the actions taken by the listed entity on those observations; (Not Applicable)
2. List of all observations in the reports pertaining to the periods prior to the previous year in case the entity has not taken sufficient steps to address the concerns raised/observations; (Not Applicable)

For S. Behera & Co.
Company Secretaries

Shesdev Behera
Company Secretary in practice

CP. No. 5980

M. No. 8428

UDIN: F008428D000386850



Date: 25/05/2022

Place: New Delhi