

# Amluckie Investment Company Limited

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CIN: L15491WB1876PLC000341

28<sup>th</sup> May, 2022

To,  
The Secretary,  
The Calcutta Stock Exchange Ltd.  
7, Lyons Range,  
Kolkata – 700 001  
**Scrip Code : 11203**

Dear Sir/Ma'am,

**Sub: Submission of Annual Secretarial Compliance Report for the financial year ended 31st March, 2022.**

**Ref: Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.**

Pursuant to Regulation 24A of SEBI(Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIRICFDICMDI//27 /2019 dated February 8, 2019. Please find attached herewith the Annual Secretarial Compliance Report issued by Ms. Ankita Goenka (FCS: 10572, COP: 14204), Practicing Company Secretary, for the Financial Year ended 31st March, 2022.

Kindly take the aforesaid information on record and oblige.

Yours faithfully,  
For **Amluckie Investment Co. Ltd**

*Surendra Kumar Jain*

**Surendra Kumar Jain**  
**(Managing Director)**  
**DIN: 00166852**

**[Pursuant to circular CIR/CFD/CMD1/27/2019 dated February 08/2019 for the purpose of compliance with Regulation 24A of SEBI(Listing obligations and Disclosure Requirements) Regulations,2015]**

*Secretarial Compliance Report of **AMLUCKIE INVESTMENT COMPANY LIMITED** for the year ended **31st March, 2022.***

We have conducted physical as well as online verification & examination of :

A. All the documents and records made available to us and explanation provided by **AMLUCKIE INVESTMENT COMPANY LIMITED** ("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, 2022 ("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");

**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; **Not applicable during the year under review.**

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 during the year under review.**

e. Securities and Exchange Board of India (Share-Based Employee Benefits) Regulations, 2014; **Not applicable during the year under review.**

f. Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Not applicable during the year under review.**

g. Securities and Exchange Board of India(Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **Not applicable during the year under review.**

h. Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

i. Securities and Exchange Board of India (Depository Participant) Regulations, 2018;

and based on the above examination and considering the relaxation granted by the Ministry of Corporate Affairs and Securities and Exchange Board of India warranted due to the spread of the Covid 19 Pandemic. I hereby report that, during the review period:

**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.
- 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 except website of the Company except website of the Company which require updation at the time of examination.

SL. No.	Compliance Requirements (Regulations/ Circulars/ Guidelines including specific clause)	Deviations	Observations/Remarks of the Practicing Company Secretary
1.	Regulation 7 (3) SEBI LODR – Compliance Certificate certifying maintaining physical & electronic transfer facilities by the compliance officer of the listed entity and the authorized representative of the share transfer agent	Regulation 7 (3) SEBI LODR	The Company has filed the same , however (only covering letter)it was not signed by Company Secretary.
2.	As per Regulation 18 (2) (a) The audit committee shall meet at least four times in a year and not more than one hundred and twenty (120) days shall elapse between two meetings	Gap between the meetings held on 25 th,June 2021, was 132 days.	With regard to conduct of Audit Committee meeting beyond the prescribed gap of 120 days, it was explained that, as the working of the Company was severely affected due to long Covid-19 Pandemic lockdown, the meeting could be conducted with a marginal delay keeping in view the extension granted by MCA vide its circular date 3rd May, 2021, for holding such meetings from 120 days to 180 days. The matter was suitably explained .

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 thereunder:

<b>Sr. No.</b>	<b>Action taken by</b>	<b>Details of violation</b>	<b>Details of action taken E.g. fines, warning letter, debarment, etc.</b>	<b>Observations/ remarks of the Practicing Company Secretary, if any.</b>
1.	As per Regulation 6(1) of SEBI LODR, A listed entity shall appoint a qualified company secretary as the compliance officer. However Jyoti Gupta the Company secretary of the Company resigned on 13 <sup>th</sup> August ,2021	The Company has not yet appointed any Company Secretary	No such record found from the records.	The Company has given intimation of Resignation of Company Secretary as per Regulation 6 and 30 of SEBI,LODR,on 13 <sup>th</sup> August 2021, however no other Company Secretary has yet appointed

d. The following items for which the listed entity had to take any actions to comply with the observations made in previous reports:

<b>Sr. No.</b>	<b>Observations of the Practicing Company Secretary on the previous reports</b>	<b>Observations made in the secretarial compliance report for the year ended on 31st march 2021.</b>	<b>Actions taken by the listed entity, if any</b>	<b>Comments of the Practicing Company Secretary on the actions taken by the listed entity</b>
1.	The Company had received a notice no.ROC/Misc/Enemy shares/2020/219 dated 12/08/2020 from Ministry of Corporate Affairs and a further notice was received on 25.08.2020 regarding the same . Calling for information and explanations under Section 206(1) of the Companies Act,2013 for	The Directors/officers-in-default of the Company are hereby directed to show cause within 15 days from the date of issue of this notice as to why necessary penal action should not be initiated against them as Pursuant to the directions given by	The Company on 1st October 2020 submitted a letter to Niche Technologies Pvt Ltd for issuance of duplicate cum transmission certificates and a proof of dispatch of the same is held with a company with speed post	As per the clarification given by the Company ,the Company has complied as directed and the matter stands closed.

	Issuance of duplicate shares Certificates in respect of enemy shares held by the Custodian of Enemy Property of India (CEPI) and u/s 166(2) &(3) of the Companies Act,2013	the office of Custodian of Enemy Property for India,the Company issued duplicate share certificates	no. EW482855852IN dated 06/10/2020 per the provisions of Section 166(7) of the Companies Act and relevant Rules made thereunder	
2.	On 10th November 2020, the Calcutta Stock Exchange (CSE) vide a notice (Ref No. CSE/LD/15115/2020 with subsequent notice dated 24th December 2020 (Ref No. CSE/LD/15156/2020) has introduced Amnesty Scheme 2020 for all the non-compliant listed companies suspended for less than 7 years for becoming active by complying all the regulatory compliances within 45 days from the date of issue of notice dated 24th December 2020.	The Company had submitted requisite documents on 25/03/2022 with Calcutta Stock Exchange	The Company had submitted requisite documents on 25/03/2022 with Calcutta Stock Exchange	As per CSE website the company is under process of revocation

**For Ankita Goenka & Associates**  
Practicing Company Secretaries

ANKITA  
GOENKA

Digitally signed by ANKITA  
GOENKA  
Date: 2022.05.25 16:59:34  
+05'30'

**Ankita Goenka**  
**Proprietor**

**FCS No. : 10572**

**COP No. : 14204**

**UDIN No. : F010572D000377499**

**PEER REVIEW:Certificate**

**no. 2133/2022 dated 20<sup>th</sup> May,**  
**2022**

**Date -24/05/2022**

**Place - Kolkata**

