

# Amluckie Investment Company Limited

10, Princep Street, 2<sup>nd</sup> Floor, Kolkata – 700 072

Phone: 033 -40022880 \* E-mail: info@amluckie.com \* Website: www.amluckie.com \* CIN: L15491WB1876PLC000341

**29th June, 2021**

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, 2021.**

**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 Mr. Vishal Sharma (ACS: 38161, COP: 22750), Practicing Company Secretary, for the Financial Year ended 31st March, 2021.

Kindly take the aforesaid information on record and oblige.

Thanking you,

yours faithfully,  
For **Amluckie Inv. Co. Ltd**



**Krishna Banerjee**  
**(Director)**  
**DIN: 06997186**





**VISHAL SHARMA**  
PRACTICING COMPANY SECRETARY

409, 4<sup>th</sup> Floor, HMP House,  
Fairly Palace, Dalhousie  
Kolkata - 700001  
9123051290/ 9883478297  
csvishalsharma1988@gmail.com

**[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), 2015]**

**Secretarial Compliance Report of *AMLUCKIE INVESTMENT COMPANY LIMITED* for the year ended 31st March, 2021.**

We have conducted online verification & examination of :

- A. All the documents and records made available to us via electronic platform due to the massive outbreak of Covid-19 pandemic and resultant state wide lockdown 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, 2021 ("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.**



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- 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;

**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.  
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 25/03/2021 with Calcutta Stock Exchange
- 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 which has some technical glitches which needs to be sorted out.
- 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:



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Sr. No.	Action taken by	Details of violation	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
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 Issuance of duplicate shares Certificates in respect of enemy shareheld by the Custodian of Enemy Property of India (CEPI) and u/s 166(2) &(3) of the Companies Act,2013	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 per the provisions of Section 166(7) of the Companies Act and relevant Rules made thereunder	Pursuant to the directions given by the office of Custodian of Enemy Property for India,the Company issued duplicate share certificates 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 no. EW482855852IN dated 06/10/2020

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

Sr. No.	Observations of the Practicing Company Secretary on the previous reports	Observations made in the secretarial compliance report for the year ended on 31st march 2019.	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	Show cause issued dated 27/08/2018 bearing reference number .SEBI/HO/EAD-1/25280/2018 under Rule 4(1)of the SEBI (Procedure for Holding Inquiry and Imposing Penalties by Adjudicating officer) Rules,1995 and the order was passed as per the order no AP/AS/2019-20/7258 Dated 17th March 2020 under section 15I of the SEBI Act Rule 5 of the Adjudication.	As per the notice	Monetary penalty of Rs 6,60,00/-imposed under section 15HA of the SEBI Act.	Remittance of payment of fines for Case Name :Amluckie Investment Company Limited-In the matter of Illiquid Stock Option at BSE .qqs Amount: Rs 660000 Dated: 13.04.2021 Transaction no. CNRBR5:2021041360456013, Bank details SEBI-Penalties Remittable to Government of India. Account No. 31465271959 Bank -SBI ,Bandra -Kurla Complex.



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**For Vishal Sharma**

Practicing Company Secretaries

VISHAL SHARMA  
SHARMA

Digitally signed by  
VISHAL SHARMA  
Date: 2021.06.30  
09:43:54 +05'30'

**Vishal Sharma**  
**(Proprietor)**

**ACS No.: 38161**

**COP No.: 22750**

**UDIN No.: A038161C000535438**

**Date: 29<sup>TH</sup> June, 2021**

**Place: Kolkata**