

"NAMO NARAYAN"



M. K. Exim (India) Limited

CIN No.L63040RJ1992PLC007111

Regd. Office : G1/150, Garment Zone, E.P.I.P. Sitapura, Tonk Road, Jaipur-302022
Tel : +91-141-3937500/501 **Fax :** +91-141-3937502 **Website :** www.mkexim.com
E-mail : mkexim@gmail.com, mkexim123@gmail.com, info@mkexim.com

May 30, 2023

To
The Deputy Manager,
Department of Corporate Services-Listing,
BSE Limited,
Floor 25, P J Towers,
Dalal Street,
Mumbai-400 001

Sub: Annual Secretarial Compliance Report for the year ended on March 31, 2023.

Ref: M.K. Exim (India) Ltd. Scrip Code: 538890

Dear Sir/Madam,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, read SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019; please find enclosed herewith the Annual Secretarial Compliance Report of the Company for the financial year 2022-23 issued by Ms. Anshu Parikh (FCS 9785), Practicing Company Secretary.

Request you to please take the above information on records.

Thanking You,

Yours faithfully,
For M.K. Exim (India) Ltd.

Manish Murlidhar Dialani
Managing Director
DIN: - 05201121

Encl: as above

ANSHU PARIKH & ASSOCIATES

Company Secretaries

Flat no-202, Alokik Orchid.

D-159A, Savitri Path, Bapu Nagar, Jaipur

Mob: +91-9887658618.

E-mail: parikhanshu26@gmail.com

Secretarial compliance report of M.K EXIM (INDIA) LIMITED for the year ended 31stMarch, 2023

To,
M.K. Exim (India)Limited
G-1/150, Garment Zone, EPIP,
Sitapura, Tonk Road, Jaipur-302022

I have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by M.K. Exim (India)Limited (hereinafter referred as 'the listed entity'), having its Registered Office at G-1/150, Garment Zone, EPIP Sitapura, Tonk Road, Jaipur-302022. Secretarial Review was conducted in a manner that provided me a reasonable basis for evaluating the corporate conducts/statutory compliances and to provide my/our observations thereon.

Based on my 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, I hereby report that the listed entity has, during the review period covering the financial year ended on 31.03.2023 complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter :

I/We have examined:

- (a) all the documents and records made available to us and explanation and representation provided by **M.K. Exim (India) Limited [CIN: L63040RJ1992PLC007111]** ("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 report,

for the year financial year ended 31stMarch, 2023 ("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 to the company during audit 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 (Not applicable to the company during audit period)
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (Not applicable to the company during audit period)
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 (Not applicable to the company during audit period)
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) (other regulations as applicable)

And circulars/ guidelines issued thereunder;

and based on the above examination, and considering the relaxations granted by Ministry of corporate Affairs and SEBI warranted due to spread of COVID-9 pandemic, I hereby report that, during the Review Period:

I (a) The listed entity has generally 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)	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



1.	Regulation 34 - a copy of the annual report sent to the shareholders along with the notice of the annual general meeting not later than the day of commencement of dispatch to its shareholders;	Regulation 34 (1) of SEBI (LODR), 2015	Non-submission of the Annual Report, 2022 within the period prescribed under this regulation	Stock exchange - BSE Fine levied for non-submission/ delayed submission of Annual Report within due date	Fine of Rs. 2000/- per day till the date of compliance	For The Year ended March 2022 Non-submission of the Annual Report within the period prescribed under this regulation	Rs. 11800 (Including GST)	Non-submission of the Annual Report, 2022 within the period prescribed under this regulation	The Company deposited the fine amount within prescribed time period	
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(b) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. 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



-	-	-	-	-	Advisory/ Clarificati on/ Fine/Sho w Cause Notice/ Warning, etc.	-	-	-	-	-
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Additional affirmations by Practicing Company Secretaries (PCS) in Annual Secretarial Compliance Report (ASCR):

II Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019 (No such event occurred during the reporting period)

III I hereby report that, during the review period the compliance status of the listed entity is appended as below

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations /Remarks by PCS*
1.	<p>Secretarial Standards:</p> <p>The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI),</p>	YES	-
2.	<p>Adoption and timely updation of the Policies:</p> <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	-
3.	<p>Maintenance and disclosures on Website:</p> <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 	YES	-



	governance reports under Regulation 27(2) are accurate and specific which re- directs to the 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, 2013as confirmed by the listed entity.	YES	-
5.	Details related to Subsidiaries of listed entities have been examined w.r.t.: (a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries	NA	-
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 Documentsand Archival policy prescribed under SEBI LODR Regulations, 2015.	YES	-
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	-
8.	Related Party Transactions: (a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or 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	-



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	-
10.	Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	YES	-
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	Yes	-
12.	Additional Non-compliances, if any: No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	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 report 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.

**For Anshu Parikh & Associates
Company Secretaries**



**Anshu Parikh
Proprietor**

FCS: 9785

CP no: 10686

UDIN: F009785E000404366

Date: 29.05.2023

Place: Jaipur