



Secretarial compliance report of Chemcon Speciality Chemicals Limited for the year ended March 31, 2022

We have examined:

- (a) all the documents and records made available to us and explanation provided by Chemcon Speciality Chemicals Limited (“the listed entity” or “the Company”);
- (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 March 31, 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 there under 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) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (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 the Audit Period)**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not Applicable to the Company during the Audit Period)**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 **(Not Applicable to the Company during the Audit Period);**





- (g) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013 (**Not Applicable to the Company during the Audit Period**);
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

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	Under Regulation 25(10) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 it is mandatory for the listed entity to undertake Directors and Officers Insurance for all its Independent Directors with effect from January 1, 2022	The listed entity has undertaken the Directors and Officers insurance which is effective from 06-04-2022	The listed entity has explained that it was in process of scrutinizing and selecting optimum Directors and Officers insurance plan for the Independent Directors, hence the delay.

- (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 our examination of those records.
- (c) During the Review Period, no action was 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 was not required to take any actions as there was no observations made by the Practicing Company Secretary (Secretarial Auditors) in previous reports which require any action to be taken.

For Kuldeep Bengani & Associates LLP,
Company Secretaries

Kuldeep Bengani
Partner

M. No. F8049, CP No.

UDIN: F008049D000422452



Date: Hyderabad

Place: 29/05/2022