



Secretarial compliance report of Chemcon Speciality Chemicals Limited for the year ended March 31, 2021

We have examined:

- (a) all the documents and records made available to us and explanation provided by Chemcon Speciality Chemicals 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 March 31, 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 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;

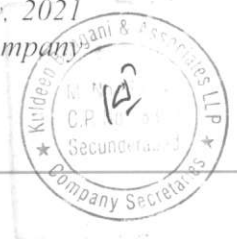
and based on the above examination, we hereby report that, during the Review Period:

- (a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder;
- (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 except the following:

Kamalkumar Rajendra Aggarwal, Shubharangana Goyal and Navdeep Naresh Goyal, the Promoters of Chemcon Speciality Chemicals Limited ("the Company") and certain members of the Promoter Group of the Company, namely, Naresh Vijaykumar Goyal and Minal Kamal Aggarwal (Applicants), have filed a settlement application dated March 10, 2019 with SEBI ("Settlement Application") in relation to their inadvertent failure to make certain disclosures required under Regulation 29 of the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 (SAST Regulations) and Regulation 7 of the SEBI Insider Trading Regulations in relation to their holdings in Overseas Synthetics Limited ("OSL"), presently known as One Global Service Provider Limited, a company listed on BSE Limited. The applicants failed to make disclosure within the time period provided under the Regulation 29(2) read with 29(3) of the SAST Regulations

The High Powered Advisory Committee (hereinafter referred to as the "HPAC") considered the proposed settlement terms made by the applicants and recommended the case for settlement upon payment of Rs. 78,08,125/- (Rupees Seventy Eight Lakh Eight Thousand One Hundred and Twenty Five only) towards the settlement terms.

The applicants paid Rs. 78,08,125/- (Rupees Seventy Eight Lakh Eight Thousand One Hundred and Twenty Five only) to SEBI towards the settlement amount of the above matter. SEBI vide settlement order dated 24th day of February, 2021 disposed of all the enforcement proceedings of SEBI in the matter. The Company was not a party to the Settlement Application.





(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. (Not Applicable to the Company during the Audit Period).

For Kuldeep Bengani & Associates LLP,
Company Secretaries

Kuldeep Bengani

Kuldeep Bengani
Partner

M. No. F8049, CP No. 8372
UDIN: F008049C000506681



Date: 24/06/2021

Place: Secunderabad