

30th May, 2024

<p>To, Department of Corporate Services BSE Ltd. Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai – 400 001.</p> <p>Ref.: Scrip Code No. : 540701 (Equity) : 974556 (Debt)</p>	<p>To, The Manager, Listing Department, National Stock Exchange of India Ltd. “Exchange Plaza”, C-1, Block G, Bandra-Kurla Complex, Bandra (E), Mumbai – 400 051.</p> <p>Ref. : (i) Symbol – DCAL (ii) Series – EQ</p>
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**SUB: ANNUAL SECRETARIAL COMPLIANCE REPORT PURSUANT TO
REGULATION 24A READ WITH BSE CIRCULARS NOS. 20230316-14 &
20230410-41 AND NSE CIRCULARS NOS. NSE/CML/2023/21 &
NSE/CML/2023/30**

Dear Sir,

With reference to the captioned subject, please find enclosed the Annual Secretarial Compliance Report for the year ended March 31, 2024, issued by Mr. Ashok P. Pathak & Co., Practicing Company Secretaries.

Kindly take the same on your record.

Thanking You,

Yours faithfully,

For, Dishman Carbogen Amcis Limited


Shrima Dave
Company Secretary



Encl.: As above



CS Ashok P. Pathak
Company Secretary &
Insolvency Professional

F- 904, Titanium City Centre, 100 ft. Anand Nagar Road,
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SECRETARIAL COMPLIANCE REPORT OF DISHMAN CARBOGEN AMCIS LIMITED

For the financial year ended on 31st March, 2024

[Under Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements)
Regulations, 2015 read with SEBI Master Circular No.
SEBI/HO/CFD/PoD2/CIR/P/2023/120 (Chapter IV – Section IV-A) dated 11th July, 2023]

CIN : L74900GJ2007PLC051338
ISIN: INE385W01011

BSE : Script Code 540701
NSE : Symbol : DCAL, Series : EQ

I, CS Ashok P. Pathak, have conducted the review of the Compliance of the applicable statutory provisions and the adherence to good corporate practices by **Dishman Carbogen Amcis Limited** ("the listed entity"), having its Registered Office at Dishman Corporate House, Iscon Bopal Road, Ambli, Ahmedabad-380058. Secretarial Review as conducted in a manner that provided me a reasonable basis for evaluating the corporate conducts / statutory compliances and to provide my 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 **31st day of March, 2024** complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter :

I, CS Ashok P. Pathak, Proprietor of M/s. Ashok P. Pathak & Co., Company Secretaries, Ahmedabad have examined :

- (a) all the documents and records made available to us and explanation provided by **Dishman Carbogen Amcis Limited**,
- (b) the filings / submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
any other document / filing, as may be relevant, which has been relied upon to make this report,





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for the financial year ended on 31st March, 2024 ("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 there under; and
- (b) the Securities Contracts (Regulation) Act, 1956 (SCRA), Rules made there under 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 there under, 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;*
- (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;*
- (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 Non- Convertible Securities) Regulations, 2021;
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

*Not Applicable as there was no reportable event during the financial year under review.

and Circulars/ Guidelines issued there under;

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

- (a) The listed entity has complied with the provisions of the above Regulations and Circulars / Guidelines issued there under.
- (b) The listed entity has no observations in the previous reports.



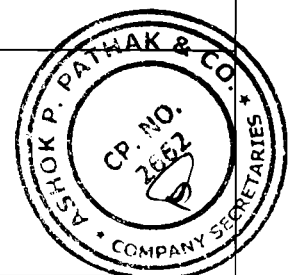


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(c) I hereby report that, during the review period the compliance status of the listed entity with following requirements :

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations / Remarks by PCS*
1.	Secretarial Standards : The compliance of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI)	Yes	
2.	Adoption and timely updation of the Policies : <ul style="list-style-type: none">All applicable policies under SEBI Regulations are adopted with the approval of Board of Directors of the listed entity.All the policies are in conformity with the SEBI Regulations and have been reviewed and updated on time, as per the regulations / circulars / guidelines issued by SEBI	Yes Yes	
3.	Maintenance and disclosures on website : <ul style="list-style-type: none">The Listed entity is maintaining a functional websiteTimely dissemination of the documents / information under a separate section on the websiteWeb-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re-directs to the relevant document(s) / section of the website.	Yes Yes Yes	
4.	Disqualification of Director : None of the Director(s) of the Company is / are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	Yes	

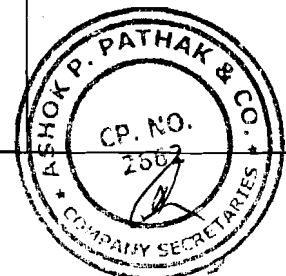




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5.	Details related to Subsidiary(ies) of listed entity have been examined w.r.t. : (a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries	Yes Yes	
6.	Preservation of Documents : The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per policy of Preservation of Documents and 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; (b) 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 NA	The listed entity has obtained prior approval of Audit Committee for all related party transactions.
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 there under.	Yes	



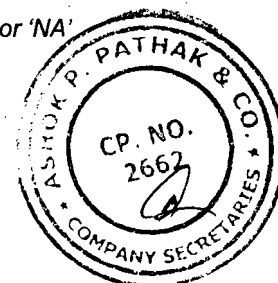


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10.	Prohibition of Insider Trading : The listed entity is in compliance with Regulation 3(5) and 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	
11.	Actions taken by SEBI or Stock Exchange(s), if any : No action(s) has been taken against the listed entity / its promoter(s) / director(s) / subsidiary(ies) 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 there under.	Yes	
12.	Resignation of statutory auditors from the listed entity or its material subsidiaries In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and / or its material subsidiary(ies) has / have complied with paragraph 6.1 and 6.2 of section V-D of chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities.	NA	There was no resignation of statutory auditor from the Company or any of its material subsidiaries during the financial year.
13.	Additional Non-Compliances, if any : No additional non-compliance observed for any of the SEBI regulation / circular / guidance note etc.	YES	

*Observations/Remarks by PCS are mandatory if the Compliance status is provided as 'No' or 'NA'





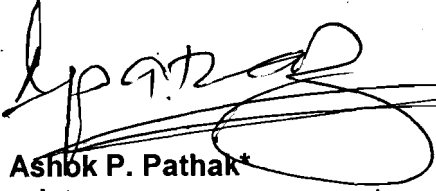
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Assumptions and Limitation of Scope and Review :

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. We have relied on the details, documents, information and explanations provided by the management, and information freely available in the public domain for the purpose of issuance of this report. Our responsibility is to report based upon our examination and 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, Ashok P. Pathak & Co.,
Company Secretaries,
ICSI Unique Code : S1997GJ020700


CS Ashok P. Pathak*
Proprietor
ACS No : 9939 | COP No : 2662
Peer Review Certificate No. : 1519/2021
ICSI UDIN : A009939F000476317



28th May, 2024
Ahmedabad

* Insolvency Professional (IP) registered with Insolvency and Bankruptcy Board of India (IBBI) (IP Registration No. IBBI/PA-002/IP-N00329/2017-18/10934).