

**June 01, 2021**

To, BSE Limited Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai- 400001 Maharashtra, India  <b>Scrip Code: 532967</b>	To, National Stock Exchange of India Limited Exchange Plaza, Bandra Kurla Complex, Bandra (E), Mumbai - 400 051 Maharashtra, India  <b>Scrip ID – KIRIINDUS</b>
--	--

Dear Sir/ Madam,

**Subject: Annual Secretarial Compliance Report for the year ended March 31, 2021.**

Pursuant to Regulation 24A of SEBI (Listing Obligation and Disclosure Requirement) Regulations, 2015 read with SEBI Circular no. CIR/CFD/CMD1/27/2019 dated February 08, 2019, we are enclosing herewith Annual Secretarial Compliance Report dated June 01, 2021 issued by M/s. Kashyap R. Mehta & Associates, Practicing Company Secretaries, Ahmedabad for the year ended March 31, 2021.

You are requested to take the same on record.

Thanking you,

Yours faithfully,

**Kiri Industries Limited**



**Suresh Gondalia**  
**Company Secretary**  
**Encl: As stated**



**DYES**

Plot No: 299/1/A & B, Phase-II, Nr. Water Tank, GIDC, Vatva,  
Ahmedabad - 382 445, Gujarat, India.  
Phone : +91-79-25894477  
Fax : +91-79-25834960  
Email : engage@kiriindustries.com Web : www.kiriindustries.com

**INTERMEDIATES**

Plot No: 396/399/403/404, EPC Canal Road, Village: Dudhwada,  
Tal.: Padra, Dist.: Vadodara - 391450. Gujarat, India.  
Phone : +91-2662-273444  
Fax : +91-2662-273444  
Email : intermediates@kiriindustries.com Web : www.kiriindustries.com

**CHEMICALS**

Plot No: 552-A, 566, 567, 569-71, Village: Dudhwada, Tal.: Padra,  
Dist.: Vadodara-391450 Gujarat, India.  
Phone : +91-2662-273724, 25  
Fax : +91-2662-273726  
Email : intermediates@kiriindustries.com Web : www.kiriindustries.com

B – 403, 'The First', Beside ITC Narmada Hotel, Behind Keshavbaug, Vastrapur, Ahmedabad – 380 015

Tel. No. : 079-2970 2975 / 76 / 77 • Mobile: 98250 15581 • Email : kashyaprmehta@hotmail.com • Web : www.cskashyap.in

1<sup>st</sup> June, 2021

To,  
The Board of Directors,  
**Kiri Industries Limited**  
7<sup>th</sup> Floor, Hasubhai Chambers,  
Opp. Town Hall, Ellisbridge,  
Ahmedabad- 380 006

Dear Sirs,

**Sub.: Secretarial Compliance Report for the year ended on 31<sup>st</sup> March, 2021**

We, **Kashyap R. Mehta & Associates, Company Secretaries, Ahmedabad** have examined:

- (a) all the documents and records made available to us and explanation provided by Kiri Industries Limited("the listed entity/the Company"),
- (b) the filings/ submissions made by the listed entity to BSE Limited and National Stock Exchange of India Limited,
- (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 on 31<sup>st</sup> March, 2021 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;

The Company has submitted necessary applicable compliances to the Stock Exchanges and is in compliance with applicable provisions of SEBI-LODR.



B – 403, 'The First', Beside ITC Narmada Hotel, Behind Keshavbaug, Vastrapur, Ahmedabad – 380 015

**Tel. No. : 079-2970 2975 / 76 / 77 • Mobile: 98250 15581 • Email : kashyapmehta@hotmail.com • Web : www.cskashyap.in**

- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;

-----Not applicable during the reporting year-----

- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;

The Company has received necessary disclosures under SEBI-SAST pertaining to occurrence of relevant events.

- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;

-----Not applicable during the reporting year-----

- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;

The ESOP scheme is on going in the Company.

- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;

There is no further issue and listing of Debt securities for the year 2020-21.

- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;

-----Not applicable during the reporting year-----

- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

The Company has notified the exchanges the particulars of trading within the stipulated time of all disclosures that have been received by the Company under the Regulations.

- (i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

Necessary applicable compliances of the above Regulations have been made.



B – 403, 'The First', Beside ITC Narmada Hotel, Behind Keshavbaug, Vastrapur, Ahmedabad – 380 015

Tel. No. : 079-2970 2975 / 76 / 77 • Mobile: 98250 15581 • Email : kashyaprmehta@hotmail.com • Web : www.cskashyap.in

- (j) Securities and Exchange Board of India (Investor Protection and Education Fund) Regulations, 2009;

Necessary applicable compliances of the above Regulations have been made.

and circulars/ guidelines issued thereunder;

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:-

(b)

Sr. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
		N.A.	

- (c) 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.

- (d) 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:

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
		N.A.		



B – 403, 'The First', Beside ITC Narmada Hotel, Behind Keshavbaug, Vastrapur, Ahmedabad – 380 015

Tel. No. : 079-2970 2975 / 76 / 77 • Mobile: 98250 15581 • Email : kashyaprmehta@hotmail.com • Web : www.cskashyap.in

(e) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended...	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	As per Regulation 17 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, number of Board of Directors was less than 6 for the quarter ended on 30 <sup>th</sup> June, 2019 & 30 <sup>th</sup> September, 2019 and for part of the quarter ended 31 <sup>st</sup> December, 2019. The Company had paid penalty of Rs. 2,47,800/- each to BSE Limited and National Stock Exchange of India Limited as per their invoice.	31-03-2020	The Company has appointed Independent Director on the Board of the Company w.e.f. 12 <sup>th</sup> November, 2019. The Board of the Company is now duly constituted.	Nil

For KASHYAP R. MEHTA & ASSOCIATES,  
COMPANY SECRETARIES,  
FRN: S2011GJ166500Date: 1<sup>st</sup> June, 2021  
Place: AhmedabadKASHYAP R. MEHTA  
PROPRIETOR  
FCS-1821 : COP-2052 : PR-583/2019  
UDIN: F001821C000406808

Notes:

- Due to restricted movement amid COVID-19 pandemic, we have conducted the assignment by examining the Secretarial Records including minutes, documents, Registers and other records etc., and some of them received by way of electronic mode from the Company and could not be verified from the original records. The management has confirmed that the records submitted to us are true and correct.
- This Report is limited to the Statutory Compliances on laws / regulations / guidelines listed in our report which have been complied by the Company up to the date of this Report pertaining to Financial Year 2020-21. We are not commenting on the Statutory Compliances whose due dates are extended by Regulators from time to time due to COVID-19 or still there is time line to comply with such compliances.