

To
The General Manager,
Dept of Corp. Services,
BSE Limited,
P. J. Towers, Dalal Street,
Mumbai – 400 001

Date: May 28, 2022

Dear Sir/Madam,

Sub: Submission of Annual Secretarial Compliance Report for the year ended March 31, 2022- Reg

Ref: VELJAN DENISON LIMITED


Scrip Code: 505232

Pursuant to Reg. 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we are herewith enclosing the Annual Secretarial Compliance Report of the Company for the year ended March 31, 2022.

This is for your information and record,

Thanking You,

Yours Truly,
For VELJAN DENISON LIMITED,


B. Narahari
Company Secretary
M. No.: A16987



To,
The Board of Directors,
Veljan Denison Limited
Plot No.44, 4th Floor,
Chikoti Gardens,
Begumpet, Hyderabad-500016
BSE CODE: 505232

Sub: Annual Secretarial Compliance Report for the Financial Year 2021-22

Dear Sir,

We have been engaged by Veljan Denison Limited (hereinafter referred to as the "Company") bearing CIN: L29119TG1973PLC001670 whose equity shares are listed on BSE Limited to conduct an audit in terms of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended read with SEBI's Circular No. CIR/CFD/CMD1/27/2019 dated 08th February, 2019 and to issue the Annual Secretarial Compliance Report thereon.

It is responsibility of the management of the company to maintain records, devise proper systems to ensure compliance with the provisions of all the applicable SEBI Regulation and Circulars/Guidelines issued there under from time to time and to ensure that the systems are adequate and are operating effectively.

Our responsibility is to verify compliances by the company with provisions of all applicable SEBI Regulations and Circulars / Guidelines issued from time to time and issue a report thereon.

Our audit was conducted in accordance with Guidance note on Annual Secretarial Compliance Report issued by the Institute of Company Secretaries of India and in a manner which involved such examinations and verifications as considered necessary and adequate for the said purpose. Annual Secretarial Compliance Report is enclosed.

Under the situation of COVID-19 Pandemic prevailing during the period when the audit was conducted for the year 2021-22, all the documents, records and other information were verified and checked electronically as provided by the management.

For BS & Company Company Secretaries LLP


D Soumya
Designated Partner

FCS. No: 11754

C.P. No.: 13199

UDIN: A029312D000417854

Date: 28th May, 2022
Place: Hyderabad

Registered Office :

5-9-22-71A, Ground Floor, MCH No. 250, Near Birla Temple, Adarsh Nagar Colony, Hyderabad - 500 063.
Ph : 040 - 2323 2327, Email : bs.companysecretaries@yahoo.com

LLP Identification Number : AAE-0638

Secretarial compliance report of Veljan Denison Limited
for the year ended 31st March, 2022

We, BS & Company Company Secretaries LLP, Practising Company Secretaries, have examined:

- (a) *All the documents and records made available to us and explanation provided by Veljan Denison 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 31st March, 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 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;
- (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; - **NA**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2014; - **NA**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; - **NA**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; - **NA**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

and circulars/ guidelines issued thereunder;



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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.

| S.No. | Compliance Requirement (Regulations/ circulars / guidelines including specific clause) | Deviations | Observations/ Remarks of the Practicing Company Secretary |
|-------|--|------------|---|
| NIL | | | |

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far as it appears from our examination of those records.

- (c) 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:

| S.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. |
|-------|-----------------|----------------------|---|--|
| NIL | | | | |

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

| S.No. | Observations of the Practicing Company Secretary in the previous reports | Observations made in the secretarial compliance report for the year ended 31 st March, 2021 | Actions taken by the listed entity, if any | Comments of the Practicing Company Secretary on the actions taken by the listed entity |
|-------|---|---|--|--|
| 1 | Regulation 17(1) - Non-compliance with the requirements pertaining to the composition of the Board for the Quarters ended June, 2020 and September, 2020. | The Company has received notice from BSE and levied penalty for the non-Compliance under the Regulation 17. However the company has paid the penalty levied and subsequently the levied penalty was waived off and the amount paid was adjusted against the listing fee to be paid by the company for the year 2021-22. | The Company has paid levied penalty. | No Comments. |

For BS & Company Company Secretaries LLP



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Designated Partner

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