



khaitan (India) Limited
CIN No. L10000WB1936PLC008775

Phone : (033) 4050 5000
Fax : (033) 2288 3961

Ref: KIL:SEC:12:2020-21
Date 23/06/2021

To Listing Compliance, National Stock Exchange India Limited, Exchange Plaza, C-1, Block-G, Bandra Kurla Complex, Bandra-(East). Mumbai-400051 NSE Symbol : KHAITANLTD	To Dept of Corporate Services BSE Ltd. (Bombay Stock Exchange) Floor 25, F.J.Towers, Dalal Street, Mumbai-400001 BSE Security Code : 590068
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Dear Sir,

Sub: Submission of Annual Secretarial Compliance Report for the year ended 31st March, 2021

In compliance of Regulation 24A of SEBI (LODR) Regulations, 2015 the Company has appointed Nisha Munka, Practicing Company Secretaries, as Secretarial Audit of the Company, for the financial year ended on 31st March, 2021. They have carried out the Secretarial audit and submitted Annual Secretarial Compliance Report. We are enclosing the copy of the same for your record please

This is for your information and records.

Thanking You

Yours faithfully
For KHAITAN (INDIA) LIMIED

PRADIP HALDER
Company Secretary and Compliance Officer



Secretarial compliance report of Khaitan (India) Limited
(CIN: L10000WB1936PLC008775)
For the year ended 31st March, 2021

I have examined:

- a) all the documents and records made available to me and explanation provided by Khaitan (India) 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 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:-

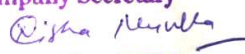
- a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements Regulations, 2015;
- b) Securities and Exchange Board of India (issue of Capital and Disclosure Requirements) Regulations, 2018 (there were no events requiring compliance during the Review Period);
- c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 (there were no events requiring compliance during the Review Period);
- d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 (there were no events requiring compliance during the Review Period);
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 (there were no events requiring compliance during the Review Period);
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (there were no events requiring compliance during the Review Period);
- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 (there were no events requiring compliance during the Review Period);
- h) Securities and Exchange Board of India (Prohibition of Insider Trading Regulations, 2015);

and circulars/ guidelines issued thereunder;

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 thereunder.
- 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 my examination of those records.
- c) As on date the trading in equity shares of Khaitan (India) Limited in NSE and BSE is showing status as Temporary Suspended. As informed by the company the reason of temporary suspension is delay in payment of Annual Fees with NSE. However, Management has informed that as on date all Annual Listing fees and other dues has been paid and the company is following up with NSE for removal of suspension. There were no other actions taken against the listed entity/ its promoters/ directors 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 in so far as it appears from my examination of those records.
- d) The reporting of actions by the listed entity to comply with the observations made in previous reports does not arise during the Review Period.

For NISHA MUNKA
Company Secretary

Nisha Munka
Practicing Company Secretary

Cop No.-18201

ACS: 49058
COP: 18201
UDIN: A049058C000475671

Place- Kolkata
Date- 16.06.2021