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**SECRETARIAL COMPLIANCE REPORT OF BODAL CHEMICALS LIMITED  
FOR THE YEAR ENDED 31<sup>ST</sup> MARCH, 2022**

To,  
Board of Directors of  
**Bodal Chemicals Limited**  
CIN: L24110GJ1986PLC009003  
PLOT NO 123/124, PHASE -1, GIDC, VATVA,  
Ahmedabad– 382445

I Tapan Shah, Practicing Company Secretary have examined:

- (a) All the documents and records made available to me through electronically by way of scan copy or soft copy through mail or otherwise and explanation provided by **Bodal Chemicals Limited**(` the Company`),
- (b) the filings/ submissions made by the Company to the stock exchanges,
- (c) website of the Company
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification;

For the year ended 31<sup>st</sup> March, 2022 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 thereunder and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India(“SEBI”);

Apart from above 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, as amended from time to time;



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- 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, as amended from time to time;
- d) Securities and Exchange Board of India (Buyback of Securities) Regulations,2018;- N.A
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 (up to 12<sup>th</sup> August,2021) and Securities and Exchange Board of India (Share Based Employee Benefits and sweat equity) Regulations, 2021(w.e.f. 13<sup>th</sup> August,2021);
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (Up to 15<sup>th</sup> August,2021) and Securities and Exchange Board of India (Issue and Listing of Non convertible Securities) Regulations, 2021 (w.e.f. 16<sup>th</sup> August,2021);-N.A
- g) Securities and Exchange Board of India(Issue and Listing of Non-Convertible and Redeemable Preference Shares)Regulations,2013;-N.A
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, as amended from time to time;
- i) SEBI (Prohibition of Fraudulent and Unfair Trade Practices relating to Securities Market) Regulations,2003; -N.A
- j) SEBI (Delisting of Equity shares) (Amendment)Regulations, 2016 and 2021 ; -N.A
- k) Securities and Exchange Board of India (Issue and Listing of Securitised Debt Instruments and Security Receipts) Regulations,2008; -N.A
- l) SEBI (Issue of Sweat Equity) Regulations,2002;- N.A.
- m) SEBI (Registrars to an Issue and Share Transfer Agents) Regulations,1993, as amended from time to time;
- n) SEBI (Depositories and Participant) Regulations,2018, as amended from time to time ;
- o) SEBI (Investor Protection and Education Fund) Regulation,2009;



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and based on the above information and considering the relaxations granted by the Ministry of Corporate Affairs and Securities and Exchange Board of India warranted due to the spread of the COVID-19 pandemic, I hereby report that, during the Period under Review:

- (a) The Company has generally complied with all the material provisions of the above Regulations and circulars/ guidelines issued thereunder,
- (b) The Company has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under in so far as it appears from my examination of those records.
- (c) The Company has prima facie complied with and included the conditions as mentioned in Para 6(A) and 6(B) of the SEBI circular CIR/CFD/CMD1/114/2019, dated October 18, 2019 in the terms of appointment of statutory auditor of the Company.
- (d) As per the undertaking and declaration given by the Management and concern person, no actions has been taken against the Company/its promoters/ directors/ material subsidiaries either by SEBI or by Stock Exchanges, under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder.
- (e) No Observations has been issued on the Company in the previous report and so compliance on the observation will not apply to the Company.

Place: Ahmedabad  
Date : 19/05/2022

Signature:  
Name of Practicing Company Secretary: Tapan Shah  
Membership No. : FCS 4476  
CP No. : 2839  
UDIN: F004476D000346246

**Note :**

Due to restricted movement amid COVID-19 pandemic, I have conducted the Secretarial audit by examining the secretarial records including Minutes, Documents, Registers and other records, etc., 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 me are the true and correct.

