

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

Ref: KIL:SEC: 12:2022-23 Date: 25/05/2022

The Manager Listing Department, National Stock Exchange of India Limited 5th Floor, C/1, G Block, Bandra Kurla Complex, Bandra (E), Mumbai – 400051,Maharashtra India NSE Symbol: KHAITANLTD The Secretary, Listing Department BSE Limited Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai – 400001 Maharashtra India BSE Symbol: 590068

Ref: SEBI Circular No. CIR/CFD/CMDT/27/2019 dated 8thFebruary 2019 read with Regulation 24A of SEBI (Listing Obligation and Disclosure Requirements) Regulation 2015

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

Dear Sir,

In terms of the above referred SEBI Circulars, we are submitting the Annual Secretarial Compliance Report of the Company for the year ended 31 March, 2022, issued by Ms. NISHA MUNKA, Practicing Company Secretaries and the Secretarial Auditors of the Company.

This is for your information and record. Thanking you,

Thanking You

Yours faithfully For KHAITAN (INDIA) LIMIED

adip flaldersom

PRADIP HALDER Company Secretary and Compliance Officer

Visit us at www.khaitan.com

Regd. Office : 20th Floor, 46C, J. L. Nehru Road, Kolkata-700 071





Secretarial Compliance Report of Khaitan (India) Limited (CIN: L10000WB1936PLC008775) For the Financial year ended 31stMarch, 2022

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, 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 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 (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 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 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 following are the details of the 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 there under:

Sr.	Action taken by	Details of	Details of a	action	Observations/	
No.		violation	taken E.g. t	fines,	remarks	of the
			warning 1	letter,	Practicing	Company
			debarment, etc.		Secretary, if any.	
	NIL	NIL	N.A.		N.A.	

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

Sr. No.		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
	The trading in equity shares of Khaitan (India) Limited in NSE and BSE is showing status as Temporary Suspended.	The trading in equity shares of Khaitan (India) Limited in NSE and BSE is showing status as Temporary Suspended.		As on date the trading in equity shares of Khaitan (India) Limited in NSE and BSE is showing status as Active (Trading Segment: Normal Market).

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.

Place: Kolkata Date: 16-05-2022

UDIN: A049058D000328612

For NISHA MUNKA Practicing Company Secretary

Nisha Munka Practicing Company Secretary © the Munth Cop No.-18201

Nisha Munka COP: 18201 ACS: 49058