

Indokem Limited

(CIN NO.: L31300MH1964PLC013088)

Registered Office :
"KHATAU HOUSE", Ground Floor,
Mogul Lane, Mahim (West),
Mumbai - 400 016.

Phone : 61236767
Fax : 61236718
Website : www.indokem.co.in

29th May, 2021

To,
The Bombay Stock Exchange Limited,
Corporate Relations Department
1st Floor, New Trading Ring,
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai - 400 001

Scrip Code: 504092

Subject: Submission of Annual Secretarial Compliance Report for the year ended 31st March, 2021 under Regulation 24(A) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Respected Sir/ Madam,

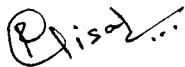
Pursuant to Regulation 24(A) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we send herewith, Annual Secretarial Compliance Report for the year ended 31st March, 2021 issued by Ragini Chokshi & Co., Company Secretaries.

Request you to kindly take the same on records.

Thanking You

Yours Truly,

For INDOKEM LIMITED



Rajesh D. Pisal
Company Secretary and Compliance Officer

Encl: a/a



Ragini Chokshi & Co.

Company Secretaries

34, Kamer Building, 5th Floor, 38 Cawasji Patel Street, Fort, Mumbai - 400 001.
E-mail : ragini.c@rediffmail.com / mail@csraginichokshi.com
web: csraginichokshi.com

Tel. : 022-2283 1120
022-2283 1134

SECRETARIAL COMPLIANCE REPORT OF INDOKEM LIMITED

FOR THE YEAR ENDED MARCH 31, 2021

[Under Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015]

We have examined:

- (a) all the documents and records made available to us and explanation provided by INDOKEM 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;(Not Applicable to the Company during the Audit Period)
- 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; (Not Applicable to the Company during the Audit Period)
- E. Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (Not Applicable to the Company during the Audit Period)
- F. Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (Not Applicable to the Company during the Audit Period)
- G. Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations,2013; (Not Applicable to the Company during the Audit Period)
- H. Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- I. Securities and Exchange Board of India (Depositories & Participants) Regulations, 2018. (To the extent applicable);

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:-

Sr. No.	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1	Regulation 30 of Securities and Exchange Board of India (Listing Obligations & Disclosure	The disclosures of outcome of board meeting held on 16 th July, 2020 and 25 th August, 2020	There was a delay of 71 Minutes and 54 Minutes in submitting the outcome/disclosure of Board meeting held on 16 th July, 2020 and 25 th August, 2020 respectively.



	Requirements) Regulations, 2015 The listed entity shall make disclosures of material events to the stock exchange, which are specified in Part A of Schedule III within 30 minutes of closure of board meeting	were submitted to stock exchange in delay.	However, the Company provided the explanation that these incidences happened at the time of lockdown prevailing due to COVID 19 crises where Company and its Statutory Auditors were working from different locations resulting into communication gap because of internet connectivity and technical issues.
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- 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/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:

Sr.No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended... (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
There are no such matters during the year under review				

- D. 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... (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	<p>Regulation 23(9) of Securities and Exchange Board of India (Listing Obligations & Disclosure Requirements) Regulations, 2015:</p> <p>The disclosure of related party transactions for the financial year ended 31st March, 2019, was filed by the company on 28th June, 2019 with a delay of 16 days.</p>	2020	None required, hence none taken.	None

Place: Mumbai
Date: 21/05/2021



For Ragini Chokshi & Co.
Company Secretaries

Makarand Patwardhan
(Partner)

CP No: 9031

ACS: 11872

UDIN: A011872C000354711