PARIKH & ASSOCIATES COMPANY SECRETARIES

Office

111, 11th Floor, Sai-Dwar CHS Ltd Sab TV Lane, Opp Laxmi Industrail Estate, Off Link Road, Above Shabari Restaurant, Andheri (W), Mumbai: 400053 Tel No 26301232 / 26301233 / 26301240 Email: cs@parikhassociates.com

Email: <u>cs@parikhassociates.com</u> parikh.associates@rediffmail.com

CERTIFICATE UNDER REGULATION 40(9) OF SECURITIES AND EXCHANGE BOARD OF INDIA (LISTING OBLIGATIONS AND DISCLOSURE REQUIREMENTS) REGULATIONS, 2015 FOR THE HALF YEAR ENDED 31st MARCH, 2021.

The Securities and Exchange Board of India (SEBI) vide gazette notification dated 8th June, 2018 and vide its press release dated 3rd December, 2018, amended Regulation 40 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and has mandated that the transfer of securities would be carried out only in dematerialized form w.e.f. 01st April, 2019. SEBI vide its press release dated 27th March, 2019 clarified that the transfer deeds lodged prior to deadline and returned due to deficiency in the document may be re-lodged for transfer even after the deadline of 01st April, 2019. Further, SEBI vide its circular dated 07th September, 2020 has fixed 31st March, 2021 as the cut-off date for re-lodgement of such transfer deeds and the shares that are re-lodged for transfers shall be issued only in demat mode. SEBI has specified operational guidelines for transfer and dematerialization of re-lodged physical shares vide its circular dated 02nd December, 2020.

Accordingly, on the basis of examination of the relevant documents relating to VINYL CHEMICALS (INDIA) LIMITED ('the Company') maintained and provided electronically by TSR Darashaw Consultants Private Limited, Registrar and Share Transfer Agents (RTA), pertaining to the period from 01st October, 2020 to 31st March, 2021 for the purpose of issuing a Certificate as per Regulation 40(9) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, We hereby certify that:

- A) 1.a. As informed to us, there were no requests relating to transfers received during the period from 01st October, 2020 to 31st March, 2021.
- 1. b. The Company has delivered during half year ended on 31st March, 2021 share certificates in respect of requests relating to transmission of securities /deletion of name received during the period from 01st October 2020 to 31st March, 2021, within thirty days, from the respective date of lodgement. As informed to us there were no requests relating to transposition of securities, sub-division (split), consolidation, renewal, exchange or endorsement of calls/allotment monies received during the said period.
- B) Any other information, if applicable: --

For Parikh & Associates

Place: Mumbai Date: April 12, 2021

P. N. Parikh FCS: 327 CP: 1228 UDIN: F000327C000052381