

BOROSIL®**Borosil Limited**

CIN : L35100MH-2010PLC292722

Registered & Corporate Office :

1101, Crescenta, G-Block, Opp. MCA Club, Bandra Kurla Complex,

Bandra (E), Mumbai - 400 051, India.

T +91 22 6740 6300

F +91 22 6740 6514

E borosil@borosil.com

W www.borosil.com

May 25, 2022

BSE Limited Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai - 400 001 Scrip Code: 543212	National Stock Exchange of India Limited Exchange Plaza, C-1, Block - G, Bandra Kurla Complex, Bandra (East), Mumbai - 400 051 Symbol: BOROLTD
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Dear Sirs,

Sub: Annual Secretarial Compliance Report for the financial year ended March 31, 2022

In terms of the Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with the SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019, please find enclosed the Annual Secretarial Compliance Report of the Company for the financial year ended March 31, 2022.

You are requested to take the same on records.

Yours faithfully,

For **Borosil Limited**

Anshu Agarwal
Anshu Agarwal
Company Secretary & Compliance Officer
FCS - 9921



Ref No: 201/2022-23

**ANNUAL SECRETARIAL COMPLIANCE REPORT OF
BOROSIL LIMITED**

(For the year ended March 31, 2022)

*Under Reg 24A of SEBI (Listing Obligations and Disclosure Requirements)
Regulations, 2015 read with SEBI Circular no CIR/CFD/CMD1/27/2019 dated 08th
February 2019*

To,

BOROSIL LIMITED

1101, 11th Floor, Crescenzo, G-Block, Plot No C-38,
Opp.MCA Club, Bandra Kurla Complex, Bandra (East),
Mumbai – 400051, Maharashtra, India.

I, **Dhrumil M Shah** have examined:

- (a) all the documents and records made available to me and explanation provided by **Borosil Limited** ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchange,
- (c) website of the listed entity,
- (d) other documents/ filings, which were relevant and relied upon to issue this certificate,

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 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. The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- b. The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- c. The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; - **Not Applicable to the Company during the review period**
- d. The Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 and The Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021;
- e. The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009 and The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021; - **Not Applicable to the Company during the review period**
- f. The Securities and Exchange Board of India (Buy-back of Securities) Regulations, 2018; - **Not Applicable to the Company during the review period**
- g. The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015; and
- h. The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018
- i. The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008, The Securities and Exchange Board of India (Issue and Listing of Non - Convertible Redeemable Preference Shares) Regulations, 2013 and The Securities and Exchange Board of India (Issue and Listing of Non - Convertible Securities) Regulations, 2021; - **Not Applicable to the Company during the review period**

and circulars / guidelines issued thereunder ;



and based on the above examination and considering the relaxations granted by the Securities and Exchange Board of India warranted due to the spread of the COVID-19 pandemic, 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 insofar as it appears from my examination of those records.
- (c) During the review period no actions were taken against the listed entity/ its promoters/directors/material subsidiary 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.
- (d) There were no observations made in previous Annual Secretarial Compliance Reports.

I further report that, during the review period, the Company & its Material Subsidiary Klass Pack Limited has complied with the events of appointment & re-appointment of Statutory Auditor respectively during the review period. In this regard, I report that the Company & its Material Subsidiary Klass Pack Limited has complied with Circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019.

Place: Mumbai
Date: 09th May, 2022



For Dhrumil M Shah & Co.
UDIN. F008021D000281261

Dhrumil M Shah
Practising Company Secretary
C.P. No. 8978 & FCS No. 8021
PR No. 995/2020