



**SHALIMAR
PAINTS**

June 26, 2021

BSE Limited
Corporate Relationship Department,
1st Floor, New Trading Ring,
Rotunda Building, P.J. Towers,
Dalal Street, Fort, Mumbai - 400 001

National Stock Exchange of India Ltd
Exchange Plaza, 5th Floor,
Plot No. C/1, G- Block
Bandra Kurla Complex, Bandra (E),
Mumbai – 400051

Reference Scrip Code- NSE-SHALPAINTS, BSE-509874

Subject- Annual Secretarial Compliance Report for the year ended March 31, 2021

Ref: SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019

Dear Sir/Madam,

In terms of Clause 3 (b)(iii) of SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019, we are submitting herewith the Annual Secretarial Compliance Report of Shalimar Paints Limited ("the Company") for the year ended March 31, 2021 issued by M/s NSP & Associates, Practicing Company Secretaries and Secretarial Auditors of the Company.

We request you to kindly take the same on records and acknowledgement receipt.

Thanking you

For Shalimar Paints Limited


(Gautam)
Company Secretary



Shalimar Paints Ltd.

Corporate Office : 1st Floor, Plot No. 28, Sector 32, Gurugram 122001, Haryana

Regd. Office: Stainless Centre, 4th Floor, Plot No. 50, Sector- 32, Gurugram-122001, Haryana (India)

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**Secretarial Compliance report of
Shalimar Paints Ltd (CIN: L24222HR1902PLC065611)
for the year ended on 31st March, 2021**

I, Naveen Shree Pandey, Proprietor of NSP & Associates, have examined:

- a) all the documents and records made available to us and explanation provided by Shalimar Paints Ltd (CIN: L24222HR1902PLC065611) ("the listed entity"),
- b) the filings/ submissions made by the listed entity to the stock exchanges,
- c) website of the listed entity,
- d) other document(s)/ filing(s), as may be relevant, which has been relied upon to make this certification;

for the year ended 31st March, 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, 1955 ("SCRA"), Rules, made thereunder and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India ("SEBI");
- c) the following Regulations prescribed under the Securities and Exchange Board of India Act, 1992 ('SEBI Act') and the circulars/guidelines issued thereunder, have been examined:
 - i. Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
 - ii. Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
 - iii. Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
 - iv. Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 - Not Applicable to the Company during the period under review;
 - v. Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 - Not Applicable to the Company during the period under review;
 - vi. Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
 - vii. 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 period under review;
 - viii. Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;



and based on the above examination and considering the relaxations granted by the Ministry of Corporate Affairs and Securities and Exchange Board of India warranted due to the spread of COVID-19 pandemic, 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:

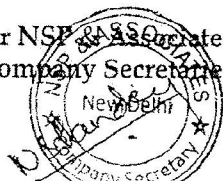
Sr. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations / Remarks of the Practicing Company Secretary
	Nil		

- 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) 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.	Action taken by	Details of violation	Details of action taken e.g. fines, warning letter, debarment, etc.	Observations / Remarks of the Practicing Company Secretary
	Nil			

- d) The Company was not required to take any action with regard to compliance with the observations made in previous reports as the same was not applicable.

For NSP & Associates
Company Secretaries
New Delhi



Naveen Shree Pandey
(Proprietor)

FCS No.: 9028

C P No.: 10937

UDIN: F009028C000451910

Place: Noida

Date: 12th June, 2021